



2023-2024 Action Plan [draft]

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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The U. S. Department of Housing and Urban Development (HUD) annually distributes Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) funds to the City of Toledo (COT), a designated entitlement City/participating jurisdiction. These federal funds, provided by HUD to the COT, promote low- to moderate-income communities by funding initiatives that provide employment possibilities for people with low- and moderate-incomes while also providing adequate, safe, and sanitary housing that is affordable and sustainable.

In addition, to CDBG, HOME and ESG, the Department of Housing and Community Development (DHCD) received Neighborhood Stabilization Program (NSP) stimulus grants (NSP1, NSP2 and NSP3). The initial NSP funds have been fully expended. NSP2 has been officially closed out with HUD. NSP1 and NSP3 program income will be utilized to complete a proposed project for the 2023 program year.

The COT completes Lead-Based Paint Hazard Control through multiple funding sources. The COT was awarded \$5.7 million from the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) to develop and run a Lead-Based Paint Hazard Control and Healthy Homes program. The three-and-a-half-year grant began 01/04/2021 and initially concludes on 06/30/2024 although it is anticipated that the DHCD will be requesting a no-cost extension of the period of performance to 06/30/2025. The program is to provide financial assistance to property owners to help control lead paint hazards in either owner-occupied and rental residential units where a pregnant female or a child under the age of 6 resides.

Additional multi-year funding in the amount of \$1,000,000 was also received from the OLHCHH to pilot a cooperation demonstration between the City's Lead Hazard Reduction grant programs and NeighborWorks Weatherization program. This grant program combines lead hazard control with weatherization and air quality restoration. The three-year program began on 07/29/2021 and concludes on 07/28/2024.

Additional funding for up to \$1,140,000 for Lead-Based Paint Hazard Control was also received from the Toledo-Lucas Regional Health District through a 3-year contract to utilize BP-Husky settlement funds. The contract commenced on 05/01/2021 and was to conclude on 03/25/2023, however a two-year extension was granted with a period end of 03/25/2025.

The fourth year of the City of Toledo's 2020-2024 Five-Year Consolidated Plan is the 2023 (49th) Program Year (PY), which starts on July 1, 2023. The proposed use of the funds that would be received from HUD is included in the 2023 (49th) PY Annual Action Plan, which outlines a one-year strategic strategy. If received, the allocated funds will help Toledo's city government utilize its substantial resources. The objectives outlined in the 2020-2024 Five-Year Consolidated Plan will be achieved with the help of these resources. The objectives were set after consulting with neighborhood organizations, gathering input from local residents, and conducting local data analyses.

The funding allocations from HUD to the COT shown below are estimated amounts for the 2023 (49th) PY. All proposed activity budgets were proportionally increased or decreased from the estimated funding levels to match actual allocation amounts.

- Community Development Block Grant (CDBG): **\$7,355,028**
- HOME Investment Partnerships Program (HOME): **\$2,551,780**
- Emergency Solutions Grant (ESG): **\$648,066**

Other resources available in the community are as follows:

- Lead Hazard Control and Healthy Homes Grant: **\$3,587,625**
- NSP1 and NSP3: **\$500,528**
- HUD Healthy Homes & Weatherization: **\$103,400**
- Section 108 Loan Guarantee Authority: **\$37,000,000**
- American Rescue Plan Act (ARPA): **\$14,000,000**
- BP Husky Settlement: **\$834,048**
- U. S. Treasury Rental Assistance: **\$34,693,010**
- CARES Act (CDBG-CV): **\$1,377,605**
- CARES Act (ESG-CV): **\$40,019**

Program Income

Program Income (PI) is the gross income received by the grantee that was directly generated from the use of CDBG, HOME, and NSP funds.

The estimated program income is listed below:

- CDBG Program Income (estimated amount): **\$223,679**
- HOME Program Income: **\$0.00**
- NSP1 and NSP3 Program Income: **\$0.00**

CDBG, HOME, and ESG are annual federal allocations. PI from CDBG, HOME, and NSP are annual projections. The allocations are available to be utilized toward meeting HUD's National Objective.

In accordance with HUD guidelines, the COT will devote at least 70% of its CDBG entitlement grant to initiatives that directly assist people with low- and moderate-incomes (LMI), people with disabilities, and other City residents. The COT will also reserve 15% of its HOME fund allotment for Community Housing Development Organizations (CHDOs) that have been approved and verified by the DHCD.

The COT will allocate funds for both operational and programmatic goals as it pertains to the following:

- Planning and Administration (Operational, Program) - CDBG, HOME, and ESG
- Housing and Neighborhood Revitalization (Operational, Program) - CDBG, HOME, NSP, ARPA and Lead
- Economic Development (Operational, Program) - CDBG
- Fair Housing (Operational, Support) - CDBG
- Public Service (Operational, Program) - CDBG and ESG
- Lead Hazard Control (Operational, Program) - Lead
- HUD Healthy Homes & Weatherization (Operational, Program) - Lead
- BP Husky Settlement (Operational, Program) - Lead
- Public Facilities and Infrastructure (Operational, Program) - CDBG
- Demolition and Blight Removal (Operational, Program) - CDBG
- HUD Section 108 Loans (Operational, Program) - CDBG

2. Summarize the objectives and outcomes identified in the Plan

Based on community feedback gathered during the citizen participation and engagement process, the 2020-2024 Five-Year Consolidated Plan's goals and priorities were established. With a focus on improving housing conditions, these objectives will target neighborhood, community, and economic development. These objectives will focus on housing conditions while addressing neighborhood, community, and economic development. Working with non-profit organizations, for-profit companies, other City departments, and local and regional organizations working to improve the conditions of Toledo residents and neighborhoods will help achieve the high priority goals referred to as providing safe, adequate, and decent affordable housing. With the help of the DHCD's Third-Party Partners or non-profit partners, public service objectives addressing basic needs in the community will be carried out. The majority of those benefited by the initiatives will fall into the low- to moderate-income category as described in 24 CFR part 5.

The COT through the five-year consolidated plan established local priorities consistent with HUD's National Objectives and, by use of CDBG, the City will continue to actively pursue initiatives/activities that will address two of the three HUD national objectives:

- Benefit to low- and moderate-income (LMI) individuals
- Elimination of slum and blight in the community

Summarized information regarding the 2023 (49th) PY goals and objectives is included in section AP-20 Annual Goals and Objectives of the Annual Action Plan. Each goal addresses one of HUD's Objectives and Outcomes listed below:

Objectives:

- **Suitable Living Environment** - create a healthy community by improving the well-being of low- to moderate-income residents through an array of services addressing basic needs and progress toward being self-sufficient.
- **Decent Housing** - to ensure access to healthy, safe and affordable housing for low- to moderate-income households in the City and to advance fair housing to address discrimination.
- **Economic Opportunity** - increase opportunities locally and create jobs.

Outcomes demonstrate how activities or programs will benefit a community or the people served. The three outcomes that will illustrate the benefits of each activity or program funded are:

Outcomes:

- Improve Availability/Accessibility
- Improve Affordability
- Improve Sustainability

All current and future activities that are funded under the five-year consolidated plan and one-year action plan will support at least one objective and one outcome.

The COT will continue to use CDBG funds in low- to moderate-income target areas and the goals will improve neighborhood conditions, economic development and address the needs of low- and moderate-income Toledo residents as identified in the 2020-2024 Five-Year Consolidated Plan.

Furthermore, the goals and actions in this Plan will Affirmatively Further Fair Housing by referencing The Fair Housing Center (TFHC) City of Toledo Analysis of Impediments to Fair Housing Choice July 1, 2020 - June 30, 2025.

3. Evaluation of past performance

As a recipient of CDBG and HOME program funds, the City is required to submit a Consolidated Annual Performance and Evaluation Report (CAPER) at the end of each program year. The CAPER summarizes each program year's accomplishments and progress toward the Consolidated Plan goals. The City has met the majority of its priority objectives identified in the 2020-2024 Five-Year Consolidated Plan, as stated in the 2021-2022 CAPER. In many cases, the City outperformed expectations. Accomplishments for the PY 2022-2023 will be available in September 2023, with the CAPER submission.

Based on the priorities established, the City continues to place emphasis on providing decent, safe, and affordable housing; elimination of homelessness; the implementation of the Fair Housing Action Plan (FHAP); and assistance with basic needs, such as food and healthcare. In PY 2022, the Department's involvement in housing projects has greatly impacted the vitality and livability of neighborhoods.

In addition to the above, the CAPER describes how CDBG funds continue to assist in meeting the needs of LMI persons with activities such as feeding programs, rehabilitation of homes, health services, park improvements etc. Furthermore, CDBG funds were used to improve blighted conditions in LMI neighborhoods.

HOME dollars were directed towards: down-payment assistance (DPA); rehabilitation of owner occupied and rental housing units, with the majority of rehabs dedicated to owner-occupied homes; and special projects such as multi-family and scattered site rehabilitation or new development projects lead by developers and/or local partners.

The DHCD continues to work with the Toledo Lucas County Homelessness Board (TLCHB) in its efforts towards the prevention and elimination of homelessness in the City of Toledo. ESG funds assisted in making significant progress towards the elimination of homelessness in Toledo. The goal of no more than 15% of

adults who exited to permanent housing returning to Rapid Re-housing, Transitional Housing, or Outreach within six months of exit continues to be met. Rapid Re-housing efforts also continue to be the focus of the Continuum of Care (CoC). PY 2022 results for ESG funded programs will be included in the 2022-2023 CAPER submittal in September 2023.

In March 2022, the Division of Code Enforcement received the results from a nationally recognized and renowned agencies, the Center for Community Progress and the May 8 Consulting Inc., a full operations assessment on the approach to Code Enforcement's critical work within our neighborhoods.

As stated in previous action plan updates, the Division is centrally focused on the development of mobile technology for field work to support the data management and governance of the output from the unit. The assessment delivered key recommendations with health and housing issues at the foremost area of concern.

The following points were created pursuant to the review of the assessment to reflect the goals and expectations for the coming year 2023.

- Transition from the *"Enforcement"* approach to a more user-friendly approach of *"Compliance"*, externally to include a culture change internally.
- Acquisition of new mobile technology for field personnel, iPads and mounting systems for Code Compliance vehicles.
- Acquisition of new software to integration to be shared with multiple entities, city, state and county agencies.
- Additional Code Compliance inspectors to aid in a more robust proactive approach to compliance.
- Lead Safe Enforcement Specialist to enforce new legislation.
- Streamline current processes and procedures.
- Future neighborhood projects, the Code Compliance Englewood Pilot Program.
- Implementation of a decision-making process in determining outcomes for violators of the code, alternate compliance tracks.

The division will continue to work at being proactive in its approach by prioritized responses based on need, improving data collection, management and analysis, consistent with equitable enforcement, ensuring safeguards in the compliance process.

At the halfway point for HOME 31st PY (2022), the Division of Housing deployed \$456,707.00 of HOME funds under the HOME at Last down payment assistance program assisting **61** LMI households in the COT.

The COT continues to utilize Neighborly to administer the Emergency Mortgage and Emergency Rental Assistance programs. To date, the Emergency Mortgage Assistance program, funded with CDBG-CV2, has assisted **62** LMI homeowners impacted by COVID-19 with \$461,015.83 of assistance averaging \$6,617.76 per household. The Lead Grant Program assisted **25** households with \$426,692.00 of grant funds to mitigate Lead Based Paint Hazards. Through its direct program administration along with its HOME-funded sub-recipient, Maumee Valley Habitat of Humanity, **29** LMI were assisted with owner-occupied rehabilitation with an average cost of \$76,500.00.

A Notice of Funding Availability (NOFA) for Affordable Rental Housing Development was not issued during the HOME 31st PY due to the projects that had received a conditional commitment in the previous PY were not successful in securing a tax credit award. The City has issued updated letters of conditional commitment to developers that are re-submitting a tax credit application on/before June 30, 2023.

A NOFA for Homebuyer Development was issued on January 13, 2023. Four applications were received from current sub-recipients. Underwriting and evaluation is underway. Conditional commitment letters will be issued on March 17, 2023.

The HOME-ARP Allocation Plan was submitted then approved by HUD on February 15, 2023. COT will move forward with deploying HOME-ARP funding as described within the plan. This includes funding for the development of affordable housing, supportive services, and administration and planning.

The Toledo Neighborhood Capacity Building Institute (TNCBI), a yearlong engagement of select non-profit organizations, neighborhood associations and community leaders designed to build capacity in strategic areas necessary for effective neighborhood revitalization and sustainability. The City of Toledo contracted with The Barthwell Group to develop and deliver the curriculum and provide evaluation consulting services. The TNCBI began, October 19, 2021 and consisted of cohorts: community leaders and designees from local organizations. The Community Leader Cohort had 12 sessions and the Organization Cohort had 15 sessions. The TNCBI sessions include, but are not limited to, board governance, mission and vision statement alignment, fundraising, grant writing, financial reporting, succession planning, collaboration, discovering tools and resources, and land use and zoning, housing development. A graduation ceremony was held on Tuesday, November 1, 2022 for members of the Toledo Neighborhood Capacity Building Institute's 1st Cohort. 17 participants received a certificate of completion and was recognized by the Mayor and City Council Members.

The DHCD continues to utilize an online application process via ZoomGrants for CDBG, ESG and HOME grant funding. In addition, all sub-recipients for CDBG and ESG electronically enter accomplishments and submit request for funds reimbursement through this system.

4. Summary of Citizen Participation Process and consultation process

The City's comprehensive approach to citizen participation and the consultation process is detailed in the City of Toledo's Citizen Participation Plan (CPP). Public participation is essential in the planning process because the involvement allows for citizen's perspectives to be highlighted and it ensures that careful attention to community needs are made in the decision-making process.

In the development of the 2023 (49th) PY Annual Action Plan, the COT consulted with non-profit organizations, Lucas Metropolitan Housing (LMH), the Fair Housing Center (TFHC), Lucas County Homelessness Board (TLCHB), and other regional and local organizations engaged in housing, community and economic development.

Residents were provided with adequate and reasonable access to meetings, information and records relating to the COT's proposed use of funds. Input from residents on the **DRAFT** Annual Action Plan will be solicited through a 30-day comment period that will commence on **Wednesday, March 22, 2023**.

The COT will hold two public hearings virtually on **Thursday, March 23, 2023** and **Thursday, March 30, 2023** via Zoom. Both public hearings will be held at 5:30 p.m. at the end of the workday for the convenience of those who work during normal business hours. The public hearings and 30-day comment period will be promoted through a media campaign that includes a public notice, press release, and website and Facebook postings. The public notice announcing the availability of the **DRAFT** Annual Action Plan and 30-day comment period will be emailed to the COT's community partners and posted on the Department of Housing and Community Development's website.

Two Citizen Review Committees (CRCs) were established to review and evaluate proposed funding requests. One committee evaluated non-homeless service related applications (which included local 501 (c)(3) Non-Profit Agencies, Government Agencies (Government Entities/Quasi-Government Agencies (not-for-profit)) and Other Non-Profits). The 2nd committee evaluated homeless service related applications. Members of the CRCs represented various community sectors including: banking, religious, healthcare, public library, financial sector, economic development, and social service agencies.

Additionally, the DHCD regularly consults with community leaders and residents in efforts to collaborate, to improve neighborhood conditions, and to offer basic services to resident. Table 2 of the AP-10 Consultation section lists those agencies or organizations with whom the DHCD consulted with directly.

All public hearings are held in facilities that provide adequate accessibility to disabled individuals, are wheel chair accessible and provide handicapped parking. In the event of a virtual public hearing, services needed by disabled individuals will be provided upon request.

5. Summary of public comments

A summary of the public hearings will be provided in the final version of this Action Plan.

6. Summary of comments or views not accepted and the reasons for not accepting them

All public comments received will be accepted.

7. Summary

The COT continues to concentrate efforts in the areas of housing, neighborhood and economic development while ensuring that basic need services are available to residents, particularly, low- to moderate-income residents. CDBG, HOME and the remaining NSP funds are used to assist and leverage programs that provide safe, adequate and decent affordable housing. ESG funds will continue to positively impact the reduction of homelessness in Toledo. The Lead Hazard Control and Healthy Homes (LHCHH) program aids property owners to control lead paint hazards in both owner-occupied and rental residential units in the City of Toledo.

The COVID-19 pandemic has had a major impact on the COT and its residents in many ways. The added funding of the CARES Act is essential in meeting new and challenging needs in the community while the annual CDBG funds have provided continued access to services.

With the implementation of the 2020 Lead Safe Ordinance and the associated Lead-Safe program, the COT will implement the following:

- **HUD CDBG Early Bird Match Grant** - this program was started in 2021 and will continue into the 2023 PY. This grant will be used as an incentive for owners to comply with the new lead ordinance by providing a 50% match on compliance costs, up to \$5,000 per rental unit, for units rented to low- to moderate-income tenants.
- **HUD Healthy Home & Weatherization** - this is a pilot program that will bridge the Lead Hazard Control and Healthy Homes (LHCHH) grant administered by the DHCD with the Weatherization Assistance Program (WAP) administered by NeighborWorks Toledo Region. This 3- year grant is currently in process. A minimum of 40-units must be completed by July 28, 2024.
- **BP Husky Settlement** - working in partnership with the Toledo Lucas County Health District, this grant will be utilized in conjunction with the Lead Hazard Control and Health Homes grant to assist property owners in the control of lead paint hazards. A minimum of 40-units must be completed by March 25, 2025 (with an anticipated 12-month extension to 06/30/2024).

The COT is focusing resources on other key initiatives and projects for the 2023 (49th) PY. Through the use of CDBG funds, the COT plans to do the following:

- **Toledo Neighborhood Capacity Building Institute (TNCBI)** - This will be the 2nd year of a yearlong engagement of select non-profit organizations, neighborhood associations and community leaders to build capacity in strategic areas necessary for effective neighborhood revitalization and sustainability.
- **Parks/Public Pools** - Revitalizing six (6) parks through the replacement of playground equipment and replacement/renovation of one (1) public pool.
- **COT Rooftop Program** - To provide roof repair or replacements in the COT through a partnership with the Department of Housing and Community Development, community partners and financial institutions. Approximately, \$2.6 million of U. S. Treasury funds will be allocated to this project, in addition, to the \$300,000 of CDBG funds.
- **HUD Section 108** - The COT through approval from HUD will establish a \$37 million loan pool to provide long-term, fixed rate and reasonably priced financing that is not available conventionally.
- **Neighborhood Revitalization Strategy Areas (NRSAs)** - With the recent HUD approval on two NRSAs for the City of Toledo. The city is committed to utilizing resources and leveraging funds to create viable neighborhoods.
- **Wayman Palmer YMCA** – The construction of a new Wayman Palmer YMCA in central Toledo, a 50,000-square-foot facility that will include multipurpose rooms for youth gaming, a demonstration kitchen, meeting rooms, gymnasiums, fitness rooms and indoor pool is set to open in 2024.

The COT is committed to providing residents and stakeholders in its jurisdiction every opportunity to participate in the Consolidated Plan process, including the Annual Action Plan. By working in conjunction with non-profit organizations and many other agencies, the COT strives to meet the goals established in the 2020-2024 Five-Year Consolidated Plan.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and also those responsible for the administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	TOLEDO	Department of Housing and Community Development
HOME Administrator	TOLEDO	Department of Housing and Community Development
ESG Administrator	TOLEDO	Department of Housing and Community Development

Table 1- Responsible Agencies

Narrative (optional)

The City of Toledo Department of Housing and Community Development is the lead agency responsible for preparing and administering the Consolidated Plan and Annual Action Plan and the use of federal funds from the U. S. Department of Housing and Urban Development (HUD) for the implementation of the goals identified in these plans.

The goals identified in the 2020-2024 Five-Year Consolidated Plan and the 2023 (49th) PY Action Plan are implemented in partnership with non-profits, public housing agency, businesses and other local and regional organizations that work to improve conditions for Toledo residents.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The COT is committed to addressing the needs of the community in the most efficient and effective way possible. Citizen participation and consultation are important aspects in the implementation of the Annual Action Plan.

In the development of the Annual Action Plan, the City consulted with non-profit organizations, Lucas Metropolitan Housing, Toledo Lucas County Homelessness Board, The Fair Housing Center, Lucas County Land Reutilization Corporation (Land Bank) and other regional and local organizations engaged in housing, community, and economic development. Input is solicited through the Citizen Participation Plan (CPP) process, which includes public hearings, a 30-day comment period and direct consultations.

The COT utilized a Citizen Review Committee (CRC), comprised of residents who have general or specific knowledge of existing community programs, understand community issues, and are able to allocate resources when consulted.

Additionally, DHCD's management consults on a regular basis with community leaders in efforts to collaborate on the improvements of neighborhood conditions and offer basic services to residents.

The City of Toledo analyzed the availability of broadband access to low-income households and the strategies being used to narrow what is referred to as the Digital Divide. A period of 2014 through 2017 was used for the analysis and showed that broadband access in general increased by 28 percent. As of 2017, nearly 80 percent of all Toledo households had access to broadband internet and 89 percent had access to a computer. Households without an internet subscription dropped 53 percent over the same four-year period.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The COT continues to promote better collaboration and coordination in housing, health, homelessness and related service efforts, and actively partners with local public and private organizations in carrying out activities designed to improve the quality of life for Toledo residents. The City regularly consults with these agencies in the development of plans and opportunities to enhance cooperation and collaboration in the delivery of services to residents. Each year, through the cooperation of major local entities, efforts are aimed at enhancing the coordination between service and housing agencies and private and public sector agencies in order to reduce gaps in service.

Lucas County Emergency Management Agency (LCEMA) prepared the Lucas County Mitigation Plan of 2019, which is an update of the Countywide All-Natural Hazard Mitigation plan of 2013. The plan's purpose as stated was *"to identify risks and vulnerabilities from hazards that affect Lucas County, Ohio to prevent or reduce the loss of life and injury and to limit future damage costs by developing methods to mitigate or eliminate damage from various hazards."* The City partnered with LCEMA and other

jurisdictions to further identify, define, and characterize the hazards affecting the City and prioritize projects that reduce hazard vulnerability of households especially those with low incomes. Technological/human caused hazards such as civil disturbance and terrorism and natural hazards including severe winter storms and temperature extremes due to climate change were added.

The Plan's Section 2.2.2 defines vulnerability as "*measure of the propensity of an object, area, individual, group, community, country, or other entity to incur the consequences of a hazard*" (Coppola, 2015, p. 33). Vulnerability can be impacted by income disparity, class, race or ethnicity, and disability to name a few factors. Hazards associated with climate change have been shown to have a disparate impact on LMI households due to poor housing conditions that many of these households live in whether renters or homeowners. These housing structures tend to suffer disproportionately during disasters. The Plan also addressed challenges faced by persons with disabilities accessing transportation to evacuate and shelters and post disaster housing. The Housing Market Analysis section of this Plan identifies the need for home repair especially among the elderly and inadequate shelters and permanent housing for the at-risk of homeless especially during disasters.

According to Ohio Emergency Management Agency, in Lucas County, there have been 78 repetitive loss (damage on two occasions) properties and eight severe repetitive loss (damage on four or more occasions) properties. The City has the most repetitive loss and severe repetitive loss properties in total. Another area of vulnerability for housing owned by LMI households is the cost of property insurance for persons on fixed income especially flood insurance. In some areas with many LMI households, the cost and availability of insurance is inadequate.

Other relationships exist that consist of the business community, faith-based organizations, public service entities, housing providers, foundations, and other community organizations that advocate on behalf of those in need. Increased communication with all community stakeholders will continue to result in more formalized relationships that nurture and promote the City of Toledo's plans and goals.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

TLCHB promotes an inclusive and comprehensive planning continuum, including the establishment of a CoC governance structure, which will include representation from all CoC partners formally operating as members of the CoC. Key thresholds for membership include but are not limited to: status as recipient/sub-recipient of CoC and/or ESG program funds, participation in the Coordinated Entry (CE), and participation in the Homelessness Management Information System. The CoC will be responsible for providing expertise and recommendations to the TLCHB Board of Directors and Executive Director regarding matters relating to CoC responsibilities, policies, and procedures. Over 2021-2023 TLCHB facilitated a process to develop a strategic plan to be adopted by the CoC, identifying updated priorities, goals, and action steps toward accomplishing those goals, and holding visioning sessions with CoC stakeholders to draft and approve a new governance charter, to define the CoC, establish a new CoC Board, and strengthen governing processes.

TLCHB oversees the local CE for the CoC, which includes a universal accessible main access point in partnership with United Way 2-1-1. Lucas County residents can present as homeless/at-risk of becoming homeless by calling 2-1-1. The CE provides referrals to emergency shelters and includes prevention/diversion efforts to prevent at risk households from experiencing homelessness by diverting to community resources. When presenting as homeless or at-risk, residents are quickly assessed and prioritized for referral to programs through prevention/diversion or the Community by Name List.

The State of Ohio's Housing Crisis Response Program and United Way of Greater Toledo's funds are used to leverage Project Home (RRH). TLCHB is the Project Home project manager which includes participation from Leading Families Home, United Way of Greater Toledo, Catholic Charities, and Lutheran Social Services. Project Home provides financial and support service resources necessary for people to obtain/maintain permanent housing, focusing on households at imminent risk of experiencing homelessness; persons exiting shelter and transitional housing; persons released by public institutions without permanent housing; and adequate community response in the areas of housing, education, and employment.

In partnership with Lucas Metropolitan Housing (LMH), TLCHB administered **123** HUD Emergency Housing Vouchers (current utilization rate: **85%**). TLCHB manages the No Barriers Housing Initiative, a local Housing First initiative designed to provide designated Housing Choice Vouchers to individuals identified as chronically homeless (current utilization rate: **86%**). Over **60** chronically homeless individuals were successfully housed in the last year. LMH has offered to allocate additional vouchers moving forward.

TLCHB collaborates with LMH on the Park Apartment project to integrate Transition Aged Youth (TAY) services into the CE. This project will offer 45 units of permanent supportive housing to TAY (18-24 years old) with a disability in 2024, serving Lucas Co.'s highest-need youth experiencing homelessness. A task force was convened to begin service planning. Tenant based vouchers will be available for positive exits. The CoC is home to Safety Net, a 24-hour shelter designed for at risk/fleeing youth. TLCHB manages a Family By-Name list for rapid and permanent supportive housing for households with children experiencing homelessness. TLCHB is convening community stakeholders to plan for the Youth Homelessness Demonstration Program (YHDP). The goal of YHDP is to support selected communities in the development and implementation of a coordinated community approach to prevent and end youth homelessness on a local and national level. Through the Race Equity and Access Core Committee, TLCHB is coordinating the formation of a Youth Action Board, which will sit on the CoC and be integral in providing guidance/lived expertise to TLCHB and the CoC.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The COT works in conjunction with TLCHB, the lead agency in the Continuum of Care (CoC), for all issues related to the elimination of homelessness in Toledo. The City of Toledo, Department of Housing and Community Development, in close partnership with the TLCHB, develops and implements the local

process for allocating ESG funds. ESG funds are allocated by the DHCD in accordance with the requirements of the Homeless Emergency Assistance and Rapid Transitions to Housing (HEARTH) Act of 2009.

Written standards adopted by the CoC establish policies and procedures to be followed by the individual CoC members in the implementation of the ESG program. TLCHB assists in designing the RFP, establishing score cards, and establishing the priorities for ESG funding. TLCHB reviews all applications with DHCD staff to ensure they are complete. The allocation of ESG funds includes the engagement of a Citizens Review Committee (CRC) whose members evaluate applications submitted by area homeless providers and makes funding recommendations to the department. TLCHB attends the Citizen Review Committee scoring session with DHCD. TLCHB also produces the annual monitoring report for the ESG homeless services providers for the CRC to review.

An explanation of the use of ESG funds is included in the public hearings that are held as part of the Consolidated and Annual Action Plan development process to allow the community an opportunity to provide input on proposed ESG allocations. CoC members are typically present at the public hearings and are aware of the 30-day comment period on the published DRAFT Annual Action Plan. Additionally, CoC members communicate directly with the DHCD if any issues/concerns arise in the allocation process.

CoC Quality and Performance Committee recommended performance standards and evaluation outcomes for providing ESG and CoC assistance, which include OH-501 Toledo/Lucas County CoC Written Standards, Coordinated Entry written standards, performance indicators and the Project Home re-housing policy. These written standards have been approved by the TLCHB and are included in the attachments.

HMIS funds are also administered by TLCHB in accordance with the HEARTH Act and all data entered in HMIS is regularly evaluated to assess progress towards the elimination of homelessness. The TLCHB maintains open two-way communication with CoC members relative to the use of the system and compliance with the reporting standards for HMIS. The TLCHB offers technical assistance as needed to those reporting into the Homeless Management Information System (HMIS). TLCHB additionally provides the Point in Time and Housing Inventory Count data and narratives for the Consolidated Plan for our jurisdiction.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

1	Agency/Group/Organization	Lucas Metropolitan Housing (LMH)
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Lucas Metropolitan Housing (LMH) was consulted to assist in determining housing needs; how LMH serves those in need for public housing (including people with disabilities); and plans to meet public housing needs. The DHCD maintains regular communications with LMH leaders regarding issues related to public housing and its residents. Consultations with LMH will continue in efforts to provide safe, adequate, and decent affordable housing to low-income individuals and their families, including the rehabilitation and resale of Low-Income Housing Tax Credit projects that have ended their 15-year compliance period.
2	Agency/Group/Organization	Toledo Lucas County Homelessness Board (TLCHB)
	Agency/Group/Organization Type	Continuum of Care Lead Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Toledo Lucas County Homelessness Board (TLCHB) is consulted regularly in all aspects related to ending homelessness in Toledo. TLCHB was consulted in the development of this Annual Action Plan. TLCHB is also a sub-recipient of HOME funds to carry out Tenant Based Rental Assistance (TBRA) activities. The COT will continue to work collaboratively with the TLCHB on all issues related to homelessness.

3	Agency/Group/Organization	The Fair Housing Center (TFHC)
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Fair Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The COT contracted with The Fair Housing Center for the development of the Analysis of Impediments (AI). Through the AI, the Fair Housing Center develops action steps needed for the elimination of impediments. The COT will continue to work collaboratively with the Fair Housing Center towards the elimination of barriers to Fair Housing.
4	Agency/Group/Organization	Lucas County Land Reutilization Corporation (Land Bank)
	Agency/Group/Organization Type	Housing Services - Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The COT consults with the Lucas County Land Reutilization Corporation (Land Bank) in addressing issues related to vacant or abandoned properties. As resources become available, the Land Bank assists the COT in the reduction of blight within the City limits particularly through the demolition of unsafe units and rehabilitation projects.

Table 2 - Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

All pertinent agencies in the City and County were consulted.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Toledo Lucas County Homelessness Board	Elimination of Homelessness is a goal in both the CoC CASE Plan and the City of Toledo 2020-2024 Five-Year Consolidated Plan. The COT works with the CoC to implement strategies toward the elimination of homelessness.

Table 3 - Other local / regional / federal planning efforts

Narrative (optional)

The City of Toledo, Department of Housing and Community Development has cultivated many relationships in the community leading to the development of efficient strategies that assist in addressing community issues. Those relations include individuals, neighborhood groups, investors and organizations working towards the stabilization and growth of Toledo. The DHCD will continue to cultivate relationships that result in an effective and efficient implementation of the Consolidated Plan.

The Department has consulted with Buckeye Broadband, a local internet services provider, to discuss efforts to narrow the digital divide for underserved populations. Buckeye Broadband, through its corporate giving program, provides free internet services to community centers, libraries, and senior citizen centers. As opportunities arise to extend internet service to LMI individuals, the City anticipates further collaboration with Buckeye Broadband in meeting these needs.

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The Citizen Participation Process is essential in the development of the Annual Action Plan. The COT engages in two Citizen Review Committees (CRCs), for non-homeless and homeless services, comprised of residents who have general or specific knowledge of community programs and understand community issues. The CRC members representing the following community sectors: banking, religious, healthcare, public library, economic development and social service agencies were utilized for the application evaluations, interviews of potential agencies and funding recommendations.

Public Notices were published two weeks in advance for all related events in The Blade, the Toledo Journal and/or Sojourner's Truth and La Prensa (minority papers) and also posted on the COT's website. Minority papers target the African-American and Hispanic communities.

The notices were published as follows:

- **Nov. 20, 2022** - Notice announcing the mandatory application packet pickup held **Jan. 13, 2023** published in The Blade (local general circulation).
- **Nov. 23, 2022** - Notice announcing the mandatory application packet pickup held **Jan. 13, 2023** published in The Toledo Journal and La Prensa (minority papers).
- **Dec. 30, 2022** - Press Release announcing the mandatory application packet pickup sent to Mayor's Office for release to the news and social medias.
- **Mar. 1, 2023** - Notice announcing the availability of the **DRAFT** 2023-2024 Action Plan, the 30-day comment period and the public hearings published in the Sojourner's Truth and La Prensa (minority papers).
- **Mar. 5, 2023** - Notice announcing the availability of the **DRAFT** 2023-2024 Action Plan, the 30-day comment period and the public hearings published in The Blade (local general circulation).
- **Mar. 6, 2023** - Press Release on the availability of the **DRAFT** 2023-2024 Action Plan, the 30-day comment period and the public hearings sent to Mayor's Office for release to the news and social medias.

Additionally, all Public Notices and Press Releases are sent via email to local community partners and the COT's Third-Party Partners. Public comments will be accepted beginning **Mar. 22, 2023** through **Apr. 20, 2023**.

Two Virtual Public Hearings will be held at 5:30 p.m. on **Mar. 23, 2023** and **Mar. 30, 2023** via Zoom. All public hearings are held in facilities that provide adequate accessibility to disabled individuals, are wheelchair accessible and provide handicap parking. In the event of a virtual public hearing, services needed by disabled individuals will be provided upon request.

The Department consulted with Buckeye Broadband, a local internet services provider, to discuss efforts to narrow the digital divide for underserved populations. Buckeye Broadband, through its corporate giving program, provides free internet services to community centers, libraries, and senior citizen centers. As opportunities arise to extend internet service to LMI individuals, the City anticipates further collaboration with Buckeye Broadband in meeting these needs. The COT analyzed the availability of broadband access to low-income households and the strategies being used to narrow what is referred to as the Digital Divide. A period of 2014 through 2017 was used for the analysis and showed that broadband access in general increased by 28 percent. As of 2017, nearly 80 percent of all Toledo households had access to broadband internet and 89 percent had access to a computer. Households without an internet subscription dropped 53 percent over the same four-year period.

Lucas County Emergency Management Agency (LCEMA) prepared the Lucas County Mitigation Plan of 2019, which is an update of the Countywide All-Natural Hazard Mitigation plan of 2013. The Plan's purpose as stated was *"to identify risks and vulnerabilities from hazards that affect Lucas County, Ohio to prevent or reduce the loss of life and injury and to limit future damage costs by developing methods to mitigate or eliminate damage from various hazards."* The City partnered with LCEMA and other jurisdictions to further identify, define, and characterize the hazards affecting the City and prioritize projects that reduce hazard vulnerability of households especially those with low incomes. Technological/human caused hazards such as civil disturbance and terrorism and natural hazards including severe winter storms and temperature extremes due to climate change were added.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p>	N/A	N/A	N/A	http://www.toledoblade.com/ http://www.thetoledojournal.com/ http://www.laprensatoledo.com/ http://www.thetruthtoledo.com/
2	Public Hearing	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p>	TBD	TBD	All comments received will be accepted.	https://toledo.oh.gov/departments/housing-using-community-development

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Internet Outreach	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p>	The public notice was posted on the City's website.	TBD	All comments received will be accepted.	https://toledo.oh.gov/departments/housing-community-development
4	Social Media	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p>	The public notice was posted on City's website.	TBD	All comments received will be accepted.	https://m.facebook.com/cityoftoledo/

Table 4 - Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The table below summarizes expected resources available to address the goals of this Annual Action Plan. For its PY 2023-2024 Annual Action Plan, the City anticipates receiving entitlement funding in the amount of **\$7,355,028** in CDBG, **\$2,551,780** in HOME and **\$648,066** in ESG. Other funds available to the community are listed in this section as they impact the goals of this plan and contribute to addressing community needs as identified in the 2020-2024 Five-Year Consolidated Plan. The actual HUD allocations will be included in the final version of this Action Plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	7,355,028	223,679	865,382	8,444,089	0	Per HUD, the Community Development Block Grant (CDBG) program is a flexible program that provides communities with resources to address a wide range of unique community development needs. The CDBG program works to ensure decent affordable housing, to provide services to the most vulnerable in our communities, and to create jobs through the expansion and retention of businesses. The annual allocations are typically fully expended every program year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition						Per HUD, the HOME Investment Partnerships Program (HOME) provides formula grants to States and Localities that communities use to fund a wide range of activities including homeowner rehabilitation, home buyer activities, rental housing and tenant-based rental assistance (TBRA), with the intent to provide safe, adequate and decent affordable housing to low-income households and expand the capacity of non-profit housing providers.
		Homebuyer assistance						
		Homeowner rehab						
		Multifamily rental new construction						
		Multifamily rental rehab						
		New construction for ownership						
		TBRA	2,551,780	TBD	TBD	2,551,780	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	648,066	0	0	648,066	0	In accordance with the McKinney-Vento Homeless Assistance Act, as amended, by the Homeless Emergency Assistance Rapid Transition to Housing (HEARTH) Act, HUD distributes Emergency Solutions Grant (ESG) funds to communities for street outreach, emergency shelter, homelessness prevention, rapid rehousing assistance, and homeless management information systems (HMIS). The annual allocations are typically expended every program year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Continuum of Care	public - federal	Admin and Planning Rapid re-housing (rental assistance) Rental Assistance TBRA Transitional housing	4,734,000	0	0	4,734,000	0	The Continuum of Care (CoC) Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by non-profit providers, and State and local governments to quickly re-house homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.
Section 108	public - federal	Acquisition Economic Development Housing Other: Public Facilities	37,000,000	0	0	37,000,000	0	HUD Section 108 Loan pool available to prospective borrowers citywide and provides long-term, fixed rate and reasonably priced financing. The HUD 108 will bridge the financing gaps.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other: BP Husky Settlement	private	Homeowner rehab Housing Multifamily rental rehab Other: Lead Hazard Control and Abatement	834,048	0	0	834,048	0	Working in partnership with the Toledo Lucas County Health District, this grant will be utilized in conjunction with the Lead Hazard Control and Health Homes grant to assist property owners in the control of lead paint hazards.
Other: Neighborhood Stabilization Programs (NSP)	public - federal	Acquisition Admin and Planning Homeowner rehab New construction for ownership	500,528	0	0	500,528	0	Beginning in 2009, the COT received NSP funds from HUD for concentrated efforts in revitalizing areas with the highest concentration of foreclosures. The initial NSP funds have been fully expended. NSP2 has been officially closed out. NSP1 and NSP3 program income will be utilized to complete a proposed project for the PY 2023.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other: Lead Hazard Control and Healthy Homes	public - federal	Admin and Planning Homeowner rehab Multifamily rental rehab Other: Lead Hazard Control and Abatement	103,400	0	0	103,400	0	A pilot program that will bridge the Lead Hazard Control and Healthy Homes (LHCHH) grant administered by the Department of Housing and Community Development with the Weatherization Assistance Program (WAP) administered by NeighborWorks Toledo Region.
Other: United States Department of the Treasury	public - federal	Rental Assistance	34,693,010	0	0	34,693,010	0	The United States Department of the Treasury is providing funds to assist individuals and families with up to 6 months of rental assistance.
Other: CDBG-CV	public - federal	Other: To prevent, prepare for and respond to the Coronavirus	1,377,605	0	0	1,377,605	0	CDBG-CV funds to be used to prevent, prepare for and respond to the Coronavirus. CDBG-CV - 1st round \$4,453,360 CDBG-CV - 3rd round \$1,526,505
Other: ESG-CV	public - federal	Other: To prevent, prepare for and respond to the Coronavirus	40,019	0	0	40,019	0	ESG-CV funds to be used for homeless services to prevent, prepare for and respond to the Coronavirus. ESG-CV - 1st round \$2,249,248 ESG-CV - 2nd round \$2,626,090

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other: HUD Office of Lead Hazard Control and Healthy Homes	public - federal	Admin and Planning Homeowner rehab Housing Multifamily rental rehab Other: Lead Hazard Control Abatement	3,587,625	0	0	3,587,625	0	The City of Toledo received funds from the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) to provide financial assistance to property owners to help control lead paint hazards in both owner-occupied and rental residential units within the City of Toledo.

Table 5 - Expected Resources - Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG funding is the primary source for many of the goals outlined in the 2020-2024 Five-Year Consolidated Plan and Annual Action Plans. The combination of federal funds with other state and local recourse, gives the community increased capacity to address many of the community needs. The combined resources, as well as efficiencies created through strategic partnerships with other organizations, also gives the City an increased capacity to address the needs identified in the Consolidated Plan. In combining HUD funds with these other resources, we can expand the availability of the many benefits these programs provide. These combined resources are used in efforts to increase homeownership for low- to moderate-income residents, address the crisis of homelessness, create a more suitable living environment, provide decent, safe and sanitary housing, address blight and many other beneficial activities.

HOME and ESG funds both have mandated matching requirements. While CDBG funds do not require a match, as a policy of the DHCD, all third-party partners that receive an allocation must provide a 1:1 cash match for each dollar received. Applicants receiving CDBG and ESG funds must identify and document the match in their funding applications as well as throughout the program year. The match requirement for HOME funds is set by HUD based on criteria related to severe fiscal distress. As stated in CFR 92.218, contributions counted as a match must total not less than 25% of funds drawn from HOME. The City's 2022 matching requirement continues at 0% and it is expected to remain the same for 2023.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The Lucas County Land Reutilization Corporation (Land Bank) is a community improvement corporation designed to strengthen neighborhoods in Lucas County by strategically returning vacant, abandoned and tax-delinquent properties to productive use through an open and equitable process.

To carry out housing, economic and community development activities, CDBG and HOME funded programs may obtain publicly owned land or property through the Lucas County Land Reutilization Corporation (Land Bank). The Land Bank acquires residential and commercial properties for renovation and demolition. The Land Bank will also acquire vacant land for project assembly, side lot opportunities, and long term holding and maintenance in partnership with the City of Toledo. Additionally, the Land Bank assists eligible residents in purchasing and renovating properties, and partners with community members in utilizing vacant lots from demolitions for re-use by residents, community groups, and neighborhood leaders. Vacant lots are sometimes offered to neighboring homeowners to increase lot sizes.

In meeting HUD's CDBG objective of benefit to low- and moderate-income persons and Elimination of Slum and Blight, the Land Bank aids in meeting the following goals and objectives established in this plan:

- Demolition of Blighted Properties
- Decrease Rodents in the City of Toledo
- Establish and Maintain Community Gardens
- Contaminated Sites Remediation for Re-development
- Down Payment/Closing Costs Assistance (through acquisition and rehabilitation of properties)
- New construction (only by Community-Based Development Organizations CBDO's)

Additionally, CDBG funds will be used to promote economic development opportunities by assisting for profit businesses with the attraction or retention of businesses and jobs, façade improvements, and tax and real estate incentives.

Discussion

The City is engaged in funding and participating in multiple community planning efforts with a variety of stakeholders. These sessions have led to the development of several community plans with clear vision, goals, objectives, and proposed activities along with possible sources of financing. The City has been investing in these neighborhoods and saw an opportunity to leverage its CDBG, HOME, and ESG funds with other City capital expenditures and private sector financing. The City is also reviewing its service delivery system to ensure it is both efficient and effective. The use of external organizations including community-based non-profits to deliver some services instead of internal departments was discussed. Organizational capacity of subrecipients, greater collaboration, and helping them to access other sources of funding was also highlighted.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HOME: Home Buyer Development	2020	2024	Affordable Housing	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation		Homeowner Housing Added: 6 Household Housing Unit
2	Home Buyer Down Payment/Closing Costs Assistance	2020	2024	Affordable Housing	Citywide	Improving Housing Affordability		Direct Financial Assistance to Homebuyers: 15 Households Assisted
3	Large rental housing/low-income housing tax credit	2020	2024	Affordable Housing	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation		Rental units constructed: 30 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Improvements to parks and community facilities	2020	2024	Non-Housing Community Development	Citywide Low to Moderate Income & Slum and Blight	Improving Neighborhood Conditions		Other: 7 Other
5	Slum and blight reduction	2020	2024	Non-Housing Community Development	Citywide Low to Moderate Income & Slum and Blight	Improving Neighborhood Conditions		Housing Code Enforcement/Foreclosed Property Care: 900 Household Housing Unit
6	Home Repairs for Seniors and the Disabled	2020	2024	Affordable Housing Non-Homeless Special Needs	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Adequate Housing & Services for Other Special Need		Homeowner Housing Rehabilitated: 134 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Housing Repairs and Rehabilitation	2020	2024	Affordable Housing	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation		Homeowner Housing Rehabilitated: 162 Household Housing Unit
8	Business Recruitment/Retention Assistance	2020	2024	Non-Housing Community Development	Citywide	Econ Dev: Job Creation/Access and Business Asst.		Businesses assisted: 2 Businesses Assisted
9	Coordinated Access for Homelessness	2020	2024	Homeless Non-Housing Community Development	Citywide	Adequate Housing & Services for Homeless/At Risk		Other: 1 Other
10	Rapid Re-Housing and Direct Financial Assistance	2020	2024	Affordable Housing Homeless	Citywide	Adequate Housing & Services for Homeless/At Risk		Tenant-based rental assistance/Rapid Rehousing: 104 Households Assisted
11	Permanent Supportive Housing	2020	2024	Affordable Housing Homeless	Citywide	Adequate Housing & Services for Homeless/At Risk		Homeless Person Overnight Shelter: 185 Persons Assisted
12	Increase number of emergency shelters	2020	2024	Affordable Housing Homeless	Citywide	Adequate Housing & Services for Homeless/At Risk		Homeless Person Overnight Shelter: 185 Persons Assisted
13	Increase in transitional housing	2020	2024	Affordable Housing Homeless	Citywide	Adequate Housing & Services for Homeless/At Risk		Overnight/Emergency Shelter/Transitional Housing Beds added: 22 Beds

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
14	Increase or new public services	2020	2024	Non-Housing Community Development	Citywide	Provide and expand Public (Social) Services - 15%		Public service activities other than Low/Moderate Income Housing Benefit: 10,732 Persons Assisted
15	Fair Housing Planning & Services	2020	2024	Non-Housing Community Development	Citywide	Fair Housing		Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
16	HOME CHDO Set-aside	2020	2024	Affordable Housing	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation		Homeowner Housing Rehabilitated: 5 Household housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
17	Planning and Administration - CDBG	2020	2024	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Econ Dev: Job Creation/Access and Business Asst. Adequate Housing & Services for Homeless/At Risk Provide and expand Public (Social) Services - 15% Fair Housing Improve Public Infrastructure for LMI Households		Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
18	Housing Rehabilitation Administration - CDBG	2020	2024	Affordable Housing	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation		Other: 1 Other
19	HOME Administration	2020	2024	Affordable Housing Public Housing Homeless	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Adequate Housing & Services for Homeless/At Risk		Other: 1 Other
20	Establish and Maintain Community Gardens	2020	2024	Non-Housing Community Development	Citywide Low to Moderate Income & Slum and Blight	Improving Neighborhood Conditions Provide and expand Public (Social) Services - 15%		Public service activities other than Low/Moderate Income Housing Benefit: 3,245 Persons Assisted

Table 6 - Goals Summary

Goal Descriptions

1	Goal Name	HOME: Home Buyer Development
	Goal Description	The City will use HOME funding for new construction or acquisition rehab of single-family homes for homeownership.
2	Goal Name	Home Buyer Down Payment/Closing Costs Assistance
	Goal Description	The City will use HOME funding for down payment and closing costs assistance for low- to moderate-income first-time homebuyers.
3	Goal Name	Large rental housing/low-income housing tax credit
	Goal Description	The City will provide HOME funding to assist developers with the new construction and preservation of large multi-family rental housing projects for low- to moderate income tenants including low-income housing tax credit (LIHTC) funded projects.
4	Goal Name	Improvements to parks and community facilities
	Goal Description	The City will provide CDBG funding for improvements to parks and recreational facilities in low- to moderate-income (LMI) areas or that benefit LMI residents.
5	Goal Name	Slum and blight reduction
	Goal Description	<p>The City will provide CDBG funding to reduce blight by prosecuting property owners who fail to comply with Toledo Municipal Codes related to nuisance orders in low- to moderate-income areas.</p> <p>The City of Toledo will coordinate with the Toledo/Lucas County Land Reutilization Program (Land Bank) which is a community improvement corporation designed to strengthen neighborhoods in Lucas County by returning vacant and abandoned properties to productive use.</p>
6	Goal Name	Home Repairs for Seniors and the Disabled
	Goal Description	The City will provide CDBG funding to be reallocated to home repairs and accessibility modifications to allow mainly seniors and people with disabilities to remain in their residences, including emergency repairs.
7	Goal Name	Housing Repairs and Rehabilitation
	Goal Description	The City will provide HOME and CDBG funding to provide housing assistance for rehabilitation of existing owner-occupied housing for low income households.
8	Goal Name	Business Recruitment/Retention Assistance
	Goal Description	The City will allocate CDBG funds to programs and assistance to encourage establishment and growth of small and medium private business (grants/loans/technical assistance/incentives).

9	Goal Name	Coordinated Access for Homelessness
	Goal Description	<p>The City will allocate CDBG and ESG funds to operate a centralized system for homeless assistance to determine needs and match individuals/families with the type of assistance needed.</p> <p>The City of Toledo will coordinate with other funding for homeless related assistance available through the McKinney-Vento Homelessness Assistance Act and the Toledo Lucas County Continuum of Care. These funds are not administered by the City but contribute to homelessness prevention and reduction. Outcomes will be generated by the administrators of the funds.</p>
10	Goal Name	Rapid Re-Housing and Direct Financial Assistance
	Goal Description	Provide rental financial assistance using HOME and CDBG funding to prevent homelessness and assist the homeless in obtaining/retaining permanent housing.
11	Goal Name	Permanent Supportive Housing
	Goal Description	Provide long-term, community-based housing which includes supportive services for homeless persons with disabilities.
12	Goal Name	Increase number of emergency shelters
	Goal Description	Provide temporary shelter for the homeless for a period of 90 days or less. Supportive services may or may not be provided in addition to shelter.
13	Goal Name	Increase in transitional housing
	Goal Description	Provide supportive housing services to facilitate the movement of homeless individuals and families to permanent housing, generally for up to 24 months.
14	Goal Name	Increase or new public services
	Goal Description	Provide CDBG funding for Public Services including crime and safety, programs for youth and seniors, community, non-profit capacity building, etc. carried out by community-based non-profits.
15	Goal Name	Fair Housing Planning & Services
	Goal Description	Elimination of discrimination in the provision of housing and housing-related services and elimination of segregation by affirmatively promoting inclusive communities and increasing supply of genuinely open housing.
16	Goal Name	HOME CHDO Set-aside
	Goal Description	The City will use HOME funding for the 15% set aside for community housing development corporations (CHDOs) and operating assistance to build new or rehabilitate single or multi-family housing for low to moderate-income households.
17	Goal Name	Planning and Administration - CDBG
	Goal Description	The general operations as it relates to the administration and reporting requirements, administration and staff monitoring of programs, neighborhood revitalization and fiscal oversight.
18	Goal Name	Housing Rehabilitation Administration - CDBG
	Goal Description	The administration of staff costs related to the housing rehabilitation and development programs operated by the Department of Housing and Community Development Housing Division entitlement grant and estimated program income from housing loan repayments will be used for activity delivery costs related to the housing rehabilitation program.

19	Goal Name	HOME Administration
	Goal Description	The administration and staff costs related to the operation of housing rehabilitation and development programs funded by the HOME Program.
20	Goal Name	Establish and Maintain Community Gardens
	Goal Description	Provide use of CDBG funds to establish and maintain community and rain gardens as well as promote urban agriculture in underutilized and vacant lots.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)

The following is an estimate of the number of families who will be provided affordable housing as defined by HOME:

- **36** extremely low-income families, and
- **22** low- and moderate-income families.

Projects

AP-35 Projects – 91.220(d)

Introduction

The 2020-2024 Five-Year Consolidated Plan identified priority housing and community development needs in the COT. The DHCD will coordinate the use of federal funds for strategies and actions the City will use to meet the needs of low- to moderate-income households and communities.

Below are the proposed projects/activities that will be undertaken in the 2023 (49th) PY with CDBG, HOME and ESG funding to address the priority needs and objectives in the Consolidated Plan. All proposed activities' budgets were proportionally increased or decreased from the estimated funding levels to match actual allocation amounts.

Projects

#	Project Name
1	DHCD: Planning and Administration
2	DHCD: Housing Rehabilitation Administration
3	DHCD: HOME Administration
4	Community Housing Development Organization (CHDO) Set-Aside
5	Homeowner Rehabilitation (Subrecipient and Internal)
6	Rental Housing Development
7	Home at Last Down Payment Assistance (DPA) Program
8	Home Buyer Development
9	Arts Commission of Greater Toledo, Inc
10	Believe Center Inc
11	Children's Theatre Workshop
12	Compassion Health Toledo
13	East Toledo Family Center
14	Fair Housing Opportunities of Northwest Ohio
15	Grace Community Center
16	Historic South Initiative
17	Legal Aid of Western Ohio Inc
18	Lucas County Regional Health District
19	Lucas Housing Services Corporation
20	Martin Luther King Center for the Poor
21	Maumee Valley Habitat for Humanity
22	Neighborhood Health Association of Toledo Inc
23	NeighborWorks Toledo Region
24	Pathway Inc
25	Sofia Quintero Art & Cultural Center
26	Toledo GROWs
27	Toledo Seagate Food Bank

#	Project Name
28	Aurora Project Inc
29	Beach House - PSH
30	Family House
31	Cherry St. Mission Ministries
32	HESG-2023 Homeless Services - ESG
33	COT Rooftops
34	Toledo Neighborhood Capacity Building Institute (TNCBI)
35	Wayman Palmer YMCA

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The City of Toledo priorities were allocated based on an analysis of the data from the Citizens Participation and Agency Consultation Process section and information obtained from the Needs Assessment and Market Analysis sections of the 2020-2024 Five-Year Consolidated Plan.

As a result of the analysis, the City identified priority needs and associated goals to address these needs. The priority needs are:

- Improve Housing Affordability
- Improve Neighborhood Conditions
- Increase programs for Home Repair and the Preservation of Existing Affordable Housing
- Create Jobs and Provide access to Job/Skills Training
- Homelessness: Provide Adequate Housing and Services for Special Needs Population
- Provide Adequate Housing and Services for Special Needs Populations
- Other Identified Public Service Community Needs
- Fair Housing
- Improve Public Infrastructure for LMI Households

To address these needs, the goals are as follows: homeownership housing, rental housing, affordable housing capacity, improvements to parks and community facilities, slum and blight reduction, home repairs especially for elderly, job creation/retention, business assistance, emergency and permanent housing for homeless, and special need populations.

Federal, state, and local budget cuts resulting in a reduction of funding for programs is the primary obstacle to addressing underserved needs within the City. The amount of funding for housing and non-housing activities is not adequate to meet the demand of underserved needs. Typically, the total amount funding requested in recent years exceeds the amount of funding available. Agencies also identified insufficient financial resources as the top barriers to meeting underserved needs. Agencies identified shortage of volunteers, better collaboration between social service agencies, staff turnover and capacity, transportation needs of clients, program eligibility restrictions and marketing and lack of awareness of program services as barriers to meeting underserved needs.

The Coronavirus Pandemic continues to be a slight obstacle impacting the city and many of its subrecipients' ability to address the needs of the underserved in Toledo. Additionally, increased cost of materials and services, as well as supply chain issues and labor shortages, have impacted the Third-Party Partners who serve low- to moderate-income individuals and families.

In regards to housing, the City contracted with the Toledo Fair Housing Center to complete an Analysis of Impediments to Fair Housing Choice (AI) in 2020 which identified obstacles to obtaining safe, adequate, and decent affordable housing. The City and the Fair Housing Center, in conjunction with community partners, collaborate in the implementation of a Fair Housing Action Plan to remove obstacles to fair and affordable housing in collaboration with community partners. To view a copy of the Analysis of Impediments to Fair Housing Choice, which includes the Fair Housing Action Plan, please visit the Department of Housing and Community Development website at: <https://toledo.oh.gov/departments/housing-community-development>

AP-38 Project Summary

Project Summary Information

1	Project Name	DHCD: Planning and Administration
	Target Area	Citywide
	Goals Supported	Planning and Administration - CDBG
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Econ Dev: Job Creation/Access and Business Asst. Adequate Housing & Services for Homeless/At Risk Adequate Housing & Services for Other Special Need Provide and expand Public (Social) Services - 15% Fair Housing Improve Public Infrastructure for LMI Households
	Funding	CDBG: \$1,321,006
	Description	The general operations as it relates to the administration and reporting requirements, administration and staff monitoring of programs, neighborhoods revitalization and fiscal oversight.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City of Toledo, Department of Housing and Community Development One Government Center, Suite 1800, Toledo, Ohio 43604
	Planned Activities	All of the CDBG funded activities such as funding of staff designated to carry out activities related to the planning, administration, development and implementation of the Consolidated Plan, Annual Action Plan, and the CAPER. These include the following: tracking and compilation of information; federal grants reporting; IDIS data input; fiscal oversight; CDBG activities monitoring (i.e. on-site monitoring visits, review and evaluation of agency information, assessment of progress and completion of activities, compliance with Federal regulations etc.); general administration of funds and related activities.
2	Project Name	DHCD: Housing Rehabilitation Administration
	Target Area	Citywide
	Goals Supported	Housing Rehabilitation Administration - CDBG

	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Adequate Housing & Services for Homeless/At Risk Adequate Housing & Services for Other Special Need
	Funding	CDBG: \$1,150,558
	Description	The administration of staff cost related to the housing rehabilitation and development programs operated by the Department of Housing and Community Development Housing Division and Partners.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City of Toledo, Department of Housing and Community Development One Government Center, Suite 1800, Toledo, Ohio 43604
	Planned Activities	The activities related to the administration duties of the Housing Division including: Owner-Occupied Rehabilitation; Homebuyer units' production through new construction or acquisition; rehabilitation and resale; down payment and closing costs through the Home-At-Last Program; Paint, Roof, and Emergency Repair Programs; Lead-Based Paint Hazard Programs, and Rental Housing Development Projects.
3	Project Name	DHCD: HOME Administration
	Target Area	Citywide
	Goals Supported	HOME Administration
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Adequate Housing & Services for Homeless/At Risk
	Funding	HOME: \$255,178
	Description	The administration and staff costs related to the operation of housing rehabilitation and development programs funded by the HOME Program.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City of Toledo, Department of Housing and Community Development One Government Center, Suite 1800, Toledo, Ohio 43604

	Planned Activities	The activities include all planning and administration duties of management and the Housing Division staff. The duties include the following: underwriting analysis of all projects including the owner-occupied program and the down payment assistance program; administration and monitoring of tenant-based rental assistance (TBRA) program; all aspects of homeownership financial assistance to eligible applicants; maintenance of records to support compliance with all federal regulations; entry of data into IDIS; and continued evaluation of programs, procedures and policies. Also included is the administrative funding for TBRA Third-Party Partners.
4	Project Name	Community Housing Development Organization (CHDO) Set-Aside
	Target Area	Citywide
	Goals Supported	HOME CHDO Set-aside
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation
	Funding	HOME: \$382,767
	Description	The GAP financing and \$100,000 of operating assistance for single- or multi-family rehabilitation or new construction projects owned, developed, or sponsored by Community Housing Development Organizations (CHDOs).
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	5 low- and moderate-income households will benefit from this activity.
	Location Description	Citywide
	Planned Activities	The rehabilitation or new construction of single-family homeownership units and/or rehabilitation or new construction of single-family or multi-family rental units.
5	Project Name	Homeowner Rehabilitation (Subrecipient and Internal)
	Target Area	Citywide
	Goals Supported	Housing Repairs and Rehabilitation
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation
	Funding	HOME: \$400,000
	Description	To help low- and moderate-income homeowners with housing rehabilitation to restore their homes to decent, safe, and sanitary conditions; thereby preserving the housing stock. Implemented by sub-recipients and the City of Toledo Housing Division.

	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	15 low- and moderate-income homeowners will benefit from this activity.
	Location Description	Citywide
	Planned Activities	To provide owner-occupied rehabilitation to address code violations, health and safety issues including lead-based paint hazards.
6	Project Name	Rental Housing Development
	Target Area	Citywide
	Goals Supported	Large rental housing/low-income housing tax credit
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation
	Funding	HOME: \$1,000,000
	Description	The gap financing for new construction or rehabilitation of multi-unit rental housing developed by non-profits or for-profit developers, seniors, and families. The projects are selected based on gap funding needs, consistency with COT affordable housing priorities, readiness to proceed and successfully securing all land use entitlement and project financing commitments.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	30 low- and moderate-income households will benefit from this project.
	Location Description	Citywide
	Planned Activities	The projects are intended to provide gap financing for developers and agencies developing multi-unit projects. These developments are multi-unit buildings involving new construction, rehabilitation, or repurposing.
7	Project Name	Home at Last Down Payment Assistance (DPA) Program
	Target Area	Citywide
	Goals Supported	Home Buyer Down Payment/Closing Costs Assistance
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation
	Funding	HOME: \$213,835
	Description	To provide 0% interest deferred payment loans for down payment and closing cost assistance to eligible first-time home buyer households who are buying single-family units.

	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	15 low- and moderate-income households will benefit from this project.
	Location Description	Citywide
	Planned Activities	To provide down payment and closing cost assistance to low- and moderate-income homebuyers.
8	Project Name	Home Buyer Development
	Target Area	Citywide
	Goals Supported	HOME: Home Buyer Development
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation
	Funding	HOME: \$300,000
	Description	The new construction or acquisition, rehabilitation, and resale of homebuyer units.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	6 low- and moderate-income family will benefit from this activity.
	Location Description	Citywide
9	Planned Activities	To provide gap financing for new construction or acquisition, rehabilitation, and resale of homebuyer units. The construction and rehabilitation will incorporate green building standards.
	Project Name	Arts Commission of Greater Toledo, Inc
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$20,000
	Description	A six-week, summer youth employment training program for at-risk youths ages 14-19. The program provides summer employment experience in the arts, builds job skills, connections to community and technical skills in the arts.
	Target Date	6/30/2024

	Estimate the number and type of families that will benefit from the proposed activities	13 youth ages 14-19 from low- and moderate-income families will benefit from this activity.
	Location Description	Citywide
	Planned Activities	The program activities directed to the development of artistic and job skills include the following: <ul style="list-style-type: none"> • job training through work experience; • transportation services as needed; • team building activities; • mural creation & digital design; and • creation of zines/podcasts/videos.
10	Project Name	Believe Center Inc
	Target Area	Citywide Old South End NRSA
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$48,000
	Description	To carry out eligible sports, life skills and family and educational programs for youth living in low- and moderate-income census tracts.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	50 low- and moderate-income youth ages 5-18 will benefit from this project.
	Location Description	Old South End
	Planned Activities	The planned activities will provide opportunities to carry out the following: <ul style="list-style-type: none"> • Youth Sports; • Educational Enhancement Programs (reading, writing and math); and • Recreational Opportunities (field trips, tours, camping and etc.).
11	Project Name	Children's Theatre Workshop
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$10,000
	Description	This activity will provide theatre outreach programs to the youth in low-to-moderate income (LMI) neighborhoods during the school year, providing theatre education programs for prek-8th grades.
	Target Date	6/30/2024

	Estimate the number and type of families that will benefit from the proposed activities	325 low- and moderate-income youth will benefit from this project.
	Location Description	Citywide
	Planned Activities	The Theatre Class will offer musical theatre class, devising/playwriting, and technical theatre class. Additionally, the students will audition, rehearse and perform shows for the public.
12	Project Name	Compassion Health Toledo
	Target Area	Citywide Old South End NRSA
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$70,000
	Description	This activity will directly address the problem of high infant mortality by providing comprehensive health care services to high risk obstetric patients. A social worker and two community health workers will assist Health Care Providers in addressing the Social Determinants of Health with pregnant patients.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	108 low- and moderate-income individuals will benefit from this activity.
	Location Description	Old South End
13	Planned Activities	The services associated with this activity include the following: <ul style="list-style-type: none"> • complete prenatal care; • complete reproductive plan; • connections to social services in the community; • attend nutrition, parenting and prenatal (including breastfeeding) classes; and • active participation of fathers.
	Project Name	East Toledo Family Center
	Target Area	Garfield /Starr/ Raymer Citywide
	Goals Supported	Home Repairs for Seniors and the Disabled
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Adequate Housing & Services for Other Special Need

	Funding	CDBG: \$75,000
	Description	This project entails administrative operations for minor repairs and home rehabilitation projects to assist low- and moderate-income senior residents maintain healthy, safe and sanitary living environment.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	94 low- and moderate-income seniors.
	Location Description	Citywide
	Planned Activities	The activities for this project are related to: working in partnership with the Area Office on Aging on the rehabilitation of privately owned, single-unit homes with construction dollars provided by the Area Office on Aging.
14	Project Name	Fair Housing Opportunities of Northwest Ohio
	Target Area	Citywide
	Goals Supported	Fair Housing Planning & Services
	Needs Addressed	Fair Housing
	Funding	CDBG: \$150,000
	Description	This project entails activities to ensure that residents, regardless of income, have fair housing choices and further the implementation of the Analysis of Impediments (AI) Action Plan steps towards the elimination of impediments to fair housing choice. (This Fair Housing activity is carried out as part of the Department of Housing and Community Development general program administration).
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	500 individuals and families who could potentially be facing housing discrimination will benefit from this activity.
	Location Description	Citywide
	Planned Activities	The administrative activities related to housing discrimination including: <ul style="list-style-type: none"> • Fair Housing Enforcement; • Trainings (for the public and the housing industry); • Dissemination of information at outreach events; • Implementation of action steps identified in the Analysis of Impediments (AI); and, • Land-lord Tenant Education.
15	Project Name	Grace Community Center
	Target Area	Citywide
	Goals Supported	Establish and Maintain Community Gardens

	Needs Addressed	Improving Neighborhood Conditions Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$46,609
	Description	The project entails two activities: Activity 1: promote educational enrichment for k-6th graders to sustain or increase grade level growth during summer study and help youth learn positive life skills through social learning strategies; and Activity 2: a garden cooperative which will give families a stake in ownership of the garden beds and will increase access to affordable home-grown vegetables.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	30 youth will benefit from activity 1 and 65 persons will benefit from activity in low- and moderate-income areas.
	Location Description	Citywide
	Planned Activities	To promote educational enrichment for k-6th graders to sustain or increase grade level growth during summer study and help youth learn positive life skills through social learning strategies and the garden designed to provide families in low- to moderate-income areas with a variety of vegetables throughout the growing season.
16	Project Name	Historic South Initiative
	Target Area	Old South End NRSA
	Goals Supported	Housing Repairs and Rehabilitation
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation
	Funding	CDBG: \$50,000
	Description	The project will assist owners and residents with making repairs and/or rehabilitation of properties located in the Old South End.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	13 low- and moderate-income households will benefit from this activity.
	Location Description	Old South End
	Planned Activities	The repair or rehabilitation of properties located in the Old South End. In addition, partnering with NeighborWorks and/or Maumee Valley Habitat for Humanity for interior and roofing for those residents that are eligible.
17	Project Name	Legal Aid of Western Ohio Inc
	Target Area	Citywide

	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$140,998
	Description	To provide high quality legal services regarding housing issues to low- and moderate-income adults residing within the City of Toledo.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	260 low- and moderate-income persons will benefit from this activity.
	Location Description	Citywide
	Planned Activities	The legal services for this project include the following: <ul style="list-style-type: none"> • Comprehensive Legal Representation; • Defense of eviction and foreclosure cases/secure affordable housing; • Addressing issues with unsuitable living conditions and unscrupulous landlords.
18	Project Name	Lucas County Regional Health District
	Target Area	Citywide
	Goals Supported	Slum and blight reduction
	Needs Addressed	Improving Neighborhood Conditions
	Funding	CDBG: \$63,000
	Description	The administrative costs associated with proactive inspections for rodent activity and follow-up actions such as citations and court nuisance orders.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	950 households will benefit from this project.
	Location Description	Citywide
	Planned Activities	The administrative activities associated with codes addressing rodent control.
19	Project Name	Lucas Housing Services Corporation
	Target Area	Citywide
	Goals Supported	Housing Repairs and Rehabilitation
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$95,000

	Description	The project entails two activities related to the repair or the rehabilitation to LIHTC units to make units available for purchase by low- and moderate-income households and to provide financial education, counseling and coaching services, employment coaching and services, and income services and support to Lucas Metropolitan Housing (LMH) residents.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	3 housing units will be repaired or rehabilitated for purchase by low- and moderate-income households and 30 individuals or families will receive financial education and/or counseling.
	Location Description	City Forest and North River Homes Areas Central Toledo
	Planned Activities	The activities associated with the repair, rehabilitation, and purchase of properties and financial education and/or counseling to LMH residents.
20	Project Name	Martin Luther King Center for the Poor
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$54,000
	Description	To provide grocery items, food supplements, and food boxes to low-income and homeless families, thereby, providing savings to families' budgets.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	825 low- and moderate-income persons will benefit from this project.
	Location Description	Citywide
21	Planned Activities	The operational activities related to providing food boxes to low- and moderate-income residents and, as needed, deliver food boxes to senior citizens.
	Project Name	Maumee Valley Habitat for Humanity
	Target Area	Citywide Old South End NRSA Englewood NRSA
	Goals Supported	Housing Repairs and Rehabilitation
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation
	Funding	CDBG: \$400,000

	Description	This project entails roof repair/replacement in the NRSA neighborhoods and also for low- and moderate-income households City-wide.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	66 low- and moderate-income households will benefit from roof repairs/replacements.
	Location Description	Citywide
	Planned Activities	The activities associated with carrying out roof repairs/replacements for low- and moderate-income families will benefit from this project.
22	Project Name	Neighborhood Health Association of Toledo Inc
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$154,647
	Description	To provide direct medical care through 13 community health centers to low- and moderate-income residents of the City of Toledo. Primary healthcare, preventative healthcare and specialty care will be provided.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	2,100 low- and moderate-income persons will benefit from this project.
	Location Description	Citywide
23	Planned Activities	Services associated with physical health needs such as: primary healthcare, preventative healthcare, and specialty care. LMI clients will have access to quality medical care, a full-service pharmacy at Nexus Health Care, care coordination for prescription assistance and other services, community service, specialty care such as cardiology, women's health, and podiatry. Dental services are also accessible through the Neighborhood Health Association (NHA).
	Project Name	NeighborWorks Toledo Region
	Target Area	Citywide
	Goals Supported	Housing Repairs and Rehabilitation
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation
	Funding	CDBG: \$340,000

	Description	This project entails two activities related to carrying out housing and neighborhood development through homeowner-occupied rehabilitation and improving the quality of life for Toledo residents by fostering housing and financial education.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Low- and moderate-income individuals and families will benefit from the activities undertaken under this project as follows: Activity 1: 50 housing units will be rehabilitated or repaired and Activity 2: 72 individuals or families will receive financial education and/or counseling.
	Location Description	Citywide
	Planned Activities	The activities that are directly associated with the rehabilitation of owner-occupied homes and financial education and/or counseling to low- and moderate-income individuals or households.
24	Project Name	Pathway Inc
	Target Area	Citywide
	Goals Supported	Home Repairs for Seniors and the Disabled
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Adequate Housing & Services for Other Special Need
	Funding	CDBG: \$450,000
	Description	To provide emergency repairs on owner-occupied homes for very low- to low-income adults aged 62 years or older and the permanently disabled.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	52 households will benefit from this project.
	Location Description	Citywide
	Planned Activities	The activities associated with the rehabilitation of privately owned, single-unit homes.
25	Project Name	Sofia Quintero Art & Cultural Center
	Target Area	Old South End NRSA
	Goals Supported	Establish and Maintain Community Gardens
	Needs Addressed	Improving Neighborhood Conditions Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$85,000
	Description	To increase capacity through community gardening, provide educational and life skills development opportunities to youth while promoting public art.

	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	180 low- and moderate-income residents will benefit from the produce grown in the gardens.
	Location Description	Old South End
	Planned Activities	The activities associated with low- to moderate-income residents benefitting from the produce grown in the community gardens.
26	Project Name	Toledo GROWS
	Target Area	Citywide
	Goals Supported	Establish and Maintain Community Gardens
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$48,000
	Description	To increase access to healthy food in low- and moderate-income areas of the City by establishing and maintaining community gardens. This activity will also include the conversion of blighted, vacant lots into beautiful, productive community gardens. Additionally, to work with community agencies to refer individuals needing a supplemental food parcel.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	3,000 persons residing in low- and moderate-income areas will benefit from new or existing community gardens.
	Location Description	Citywide
	Planned Activities	The activities associated with the establishment and maintenance of community gardens such as: technical assistance in project planning, problem solving, volunteer assistance, and gardening education. In addition, coordinate the distribution of free seeds and plants, educational materials, and healthy foods.
27	Project Name	Toledo Seagate Food Bank
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$60,000
	Description	This project entails two activities: Activity 1: To provide balanced, nutritional food baskets to low- and moderate-income individuals in low- and moderate-income census tracts; and Activity 2: To provide a supplemental food basket to individuals or families affected by the opioid epidemic under the Families in Recovery Staying Together (F.I.R.S.T) program.

	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	4,449 low and moderate-income unduplicated individuals will be assisted through activity 1 and 2,500 individuals through activity 2.
	Location Description	Citywide
	Planned Activities	The activities associated with the operation of a food bank and also to provide supplemental food baskets to low- to moderate-income individuals or families affected by an opiate addiction.
28	Project Name	Aurora Project Inc
	Target Area	Citywide
	Goals Supported	Increase in transitional housing
	Needs Addressed	Adequate Housing & Services for Homeless/At Risk Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$90,000
	Description	To provide Transitional Housing (TH) to homeless persons.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	21 families (34 women and children) whose head of household is suffering from substance abuse will benefit from this project.
	Location Description	Citywide
	Planned Activities	The activities associated with the operation of a Transitional Housing (TH) facility for homeless persons.
29	Project Name	Beach House - PSH
	Target Area	Citywide
	Goals Supported	Permanent Supportive Housing
	Needs Addressed	Adequate Housing & Services for Homeless/At Risk Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$70,000
	Description	Scattered-site permanent housing and services to assist adults with chronic conditions and also to maintain tenancy for themselves and their children.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	32 families (110 individuals) will benefit from this activity.
	Location Description	Citywide

	Planned Activities	Activities associated with the operation of a Permanent Supportive Housing (PSH) program.
30	Project Name	Family House
	Target Area	Citywide
	Goals Supported	Increase number of emergency shelters
	Needs Addressed	Adequate Housing & Services for Homeless/At Risk Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$56,000
	Description	The activities associated with the operation of an Emergency Shelter (ES) for homeless persons.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	120 families (450 individuals) will benefit from this activity.
	Location Description	Citywide
	Planned Activities	The activities associated with the operation of an Emergency Shelter (ES) for homeless persons.
31	Project Name	Cherry St. Mission Ministries
	Target Area	Citywide
	Goals Supported	Increase number of emergency shelters
	Needs Addressed	Adequate Housing & Services for Homeless/At Risk Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$90,392
	Description	The activities associated with the operation of an Emergency Shelter (ES) for homeless persons.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Citywide
	Planned Activities	The activities associated with the operation of an Emergency Shelter (ES) for homeless persons.
32	Project Name	HESG-2023 Homeless Services - ESG
	Target Area	Citywide
	Goals Supported	Coordinated Access for Homelessness
	Needs Addressed	Adequate Housing & Services for Homeless/At Risk
	Funding	ESG: \$648,066

	Description	The provision of services to homeless and those at-risk of homelessness in the community as well as services related to the overall management of the homeless system in the community.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Households will benefit from homeless services provided through the Emergency Solutions Grant (ESG).
	Location Description	Citywide
	Planned Activities	The activities related to coordinated assessment, rapid re-housing, direct financial assistance, permanent supportive housing, emergency shelters, youth homelessness, Homeless Management Information System (HMIS) and administration of the TLCHB.
33	Project Name	COT Rooftop Program
	Target Area	Citywide
	Goals Supported	Housing Repairs and Rehabilitation
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation
	Funding	CDBG: \$500,000
	Description	To provide roof repair or replacements in the City of Toledo.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	TBD low- and moderate-income households will benefit from a roof repair/replacement.
	Location Description	City-wide
	Planned Activities	The activities associated with carrying out roof repairs/replacements for low- and moderate-income families will be benefit from this project.
34	Project Name	Toledo Neighborhood Capacity Building Institute (TNCBI)
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$150,000
	Description	Providing technical capacity training and project grants to assist nonprofit organizations to build organizational capacity and project management skills to carry out neighborhood revitalization and economic development activities.
	Target Date	6/30/2024

	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	City-wide
	Planned Activities	Activities to include organizational assessment, technical support and provision of mini grants for CDBG eligible neighborhood and economic development, project development to nonprofit organizations.
35	Project Name	Wayman Palmer YMCA
	Target Area	Citywide
	Goals Supported	Improvements to parks and community facilities
	Needs Addressed	Improve Public Infrastructure for LMI Households
	Funding	CDBG: \$2,000,000
	Description	The activities associated with the construction of a new community center.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	Citywide
	Planned Activities	The activities associated with the construction of a new community center that will include multipurpose rooms for youth gaming, demonstration kitchen, meeting rooms, gymnasiums, fitness rooms and indoor pool.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

In general, some federal grant funded activities such as public services, economic development, and housing rehabilitation and new construction are provided on a Citywide basis to low- and moderate-income (LMI) individuals and households. As well, the City of Toledo (COT) has identified and mapped areas of the City where the LMI population is 51% or more. LMI census tracts are: 8, 9, 10, 11, 12.02, 13.02, 14, 15, 17, 18, 19, 20, 22, 23, 24.01, 24.02, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 39, 40, 42, 46, 47.01, 47.02, 48, 49, 50, 51, 52, 53, 54, 57.01, 59.02, 66, 67, 68, 73.02, 73.03, and 103.

In addition to Citywide activities, the COT also uses geographic, place-based strategies to reach the goals in the Five-Year Consolidated plan.

Geographic Distribution

Target Area	Percentage of Funds
Junction/Englewood	1
Garfield /Starr/ Raymer	1
Citywide	92
Old South End NRSA	3
Englewood NRSA	3

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Toledo neighborhoods' redevelopment and stabilization are still being impacted by national economic situations. Minorities, seniors, and people with disabilities are given priority when making investments for low- and moderate-income people. Neighborhoods that were once vibrant are now suffering from problems including an aging housing stock, a rise in abandoned and dilapidated structures that add to blight, and a lack of chances for economic development.

In accordance with HUD guidelines, the city will devote at least 70% of its CDBG entitlement award for 2020–2024 to initiatives that directly assist people of low–to moderate–income status.

In February 2023, the City of Toledo, Department of Housing and Community Development received approval of the Neighborhood Revitalization Strategy Areas (NRSAs) from HUD. The designated areas for the NRSAs are located in the Old South End and Englewood Neighborhoods. The NRSA plan is available for view on the city's website at:

https://cdn.toledo.oh.gov/uploads/documents/Toledo-NRSA_Final-Application-10-21-22.pdf.

Discussion

Every initiative and activity is designed to meet HUD's national objective of assisting low- to moderate-income families, individuals, and communities.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The COT provides affordable housing opportunities through various means, including the use of CDBG, HOME, and ESG funds. During the 2023 (49th) PY, the City will use funds to support affordable housing through rental and security deposit assistance, supportive services, construction of new units, acquisition and rehabilitation of existing units, owner-occupied home repair, and permanent housing.

Additionally, specific one-year affordable housing goals will also address the City's fair housing goals identified in the Analysis of Impediments to Fair Housing Choice (AI). The project and program goals as described in the Annual Action Plan target the non-homeless, homeless and households with special needs in the tables below.

One Year Goals for the Number of Households to be Supported	
Homeless	300
Non-Homeless	153
Special-Needs	134
Total	587

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	200
The Production of New Units	100
Rehab of Existing Units	249
Acquisition of Existing Units	38
Total	587

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The need for safe and affordable housing units for extremely low-, very low- and low-income households continue to be extremely vital. The COT plans to continue exploring additional opportunities that address this need and will identify key initiatives that will aid in meeting this high priority of the City.

AP-60 Public Housing – 91.220(h)

Introduction

Lucas Metropolitan Housing (LMH) will conduct the following actions and activities:

STRATEGIES:

1. New Strategic Plan developed.
2. Portfolio Repositioning Strategy
 - Create housing opportunities in existing high opportunity neighborhoods.
 - Improve neighborhood conditions to create mixed income communities of choice.
3. Establish Pathways to Self-Sufficiency

ACTIONS:

1. New Strategic Plan developed.
- a. Interview and/or survey employees, partners and community stakeholders to analyze the current environment at LMH.
- b. Identify and analyze Strategic Issues.
- c. Develop Objectives and Action Plans.
- d. Implement Strategies.

Actions planned during the next year to address the needs to public housing

2. Portfolio Repositioning Strategy Two-Pronged Approach.
 - Create housing opportunities in existing high opportunity neighborhoods.
 - Improve neighborhood conditions to create mixed income communities of choice.
- a. LMH will transition Low Income Public Housing (LIPH) Portfolio to a subsidy platform other than LIPH, while keeping the units affordable at 30% of AGI and ensuring the fiscal health of the agency.
- b. LMH will Grow the number of apartment homes available through a combination of New Construction, Renovation, Acquisition, Project Based Vouchers, Project Based Rental Assistance, Housing Choice Vouchers, Low-Income Housing Tax Credits and by leveraging RAD.
- c. Improve neighborhood conditions and create housing in high opportunity areas, leveraging on capital through public resources, corporate support and private investments.
- d. Transition to a flexible and reliable financial platform while maintaining and growing the supply of income-based affordable housing.
- e. Renovate our existing housing stock on a Tier Approach to address the unmet capital needs backlog and build new mixed-income communities in all areas.
- f. Close on the following initial projects investing \$200 million:
 - a. Park Apartments - 45 apartments for Transition age youth - \$14 million investment.
 - b. Collingwood Green IV - 40 townhomes - mixed income individuals and families \$20 million investment.
 - c. Collingwood Green V - 75 apartments for Seniors - \$28 million investment.
 - d. McClinton Nunn Homes Redevelopment (CNI) - 379 apartments and 63 home-ownership Mixed income families and seniors - \$108 million (Choice Neighborhoods Initiative).
 - e. Palmer Gardens - 75 apartments - mixed income families - \$15 million investment.
 - f. TenEyck Towers - 154 apartments - elderly disabled - \$15 million.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

3. Establish the first FOC under a Housing Authority in the State of Ohio to build families' and individuals' financial capability by offering them a suite of services:
 - a. Employment assistance, financial education & coaching, and access to income supports.
 - b. Through one-on-one coaching and education offered at trusted community-based organizations.
1. Leverage LMH's Housing Choice Voucher Program to support families that are assisted under the housing choice voucher program to use their voucher to buy a home and receive monthly assistance in meeting homeownership expenses.
2. All LMH homeownership and housing counseling will be completed by a HUD certified counselor working for a HUD-approved housing counseling agency. LMH's non-profit affiliate Lucas Housing Services Corporation will become a HUD Certified Counseling Agency in 2023.
3. Increase the sources of financial assistance to families to make a home affordable and connecting families to resources to meet down payment and closing costs.
4. Build stronger community connections with Financial Institutions and provide more outreach and education to participants so that families can access the funding needed for a loan.
5. Strengthen partnership with LMH's non-profit affiliate Lucas Housing Services Corporation to increase the offer of sustainable and affordable homeownership opportunities.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not Applicable. The PHA is not designated as troubled.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The Toledo Lucas County Homelessness Board (TLCHB), in partnership with the Continuum of Care (CoC) partners including the City of Toledo, continues to coordinate local efforts to reduce and end homelessness. TLCHB maintains an organizational partnership with the regional housing authority, Lucas Metropolitan Housing (LMH), to achieve this mission more effectively in our community.

TLCHB's partnership with LMH has resulted in innovations in local homelessness service delivery including the CoC's Housing First model, "*No Barriers Housing*", which incorporates HUD (Housing and Urban Development) best practices into the CoC's services as well as housing populations prioritized by the strategic plan. In 2022, TLCHB and partners will be formalizing the system-wide model's processes and systems, including the coordinated entry.

In addition, TLCHB and CoC partners have engaged in strategic planning to update and strengthen the COC, now formally entitled Home for Everyone, governance structure and CoC Board. Home for Everyone includes traditional homeless and housing service providers as well as additional community partners from other provider systems that impact and serve homeless individuals (Examples: The Lucas County Board of Commissioners, the City of Toledo Department of Housing and Community Development, United Way of Greater Toledo/2-1-1, local schools, Mental Health and Recovery Services Board, Lucas County Children's Services, Physical health providers, mental health/SUD providers, workforce providers, financial opportunity providers, etc.). TLCHB and CoC partners will continue to enhance the structure and functionality of Home for Everyone, deepen its work, and formalize its processes and outreach in 2023.

The TLCHB and partners continue to utilize Coordinated Entry (CE) data to measure progress towards ending homelessness. In addition, TLCHB and partners continue to utilize specialized case management and community outreach services for unsheltered homeless individuals through Neighborhood Properties, Inc. (NPI)'s Projects for Assistance in Transition from Homelessness (PATH) program. In 2021, TLCHB implemented the Housing Problem Solving (HPS) Program into the CE to address bottlenecks in housing referrals caused by pandemic. The implementation of this program was a response to an urgent and increasing need in our community to provide rapid resolutions, diversion, and homelessness prevention. The program model is designed to divert households with shorter histories of homelessness and less severe service needs away from entering the homelessness system by problem solving on the front end of Coordinated Entry, thus preserving limited emergency shelter and supportive housing resources for those with longer histories of homelessness and severe service needs. This program has been expanded to include dedicated Eviction Prevention activities through the use of Emergency Rental Assistance II funds.

The TLCHB and partners will be utilizing these new and existing structures to successfully implement this Action Plan's goals for homeless individuals and for other special needs activities. TLCHB continues to provide support and advocacy for agencies and organizations seeking to develop or acquire new supportive housing for populations experiencing chronic homelessness and/or more severe service needs, including Warren Commons, Park Apartments, and Whitney Manor.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

TLCHB and its CoC partners will continue to coordinate community outreach activities to individuals experiencing homelessness among various sectors, including education, mental health/SUD, physical health, criminal justice and corrections, social services, housing, workforce, and financial opportunity providers. Specialized attention will include coordinating directly with United Way of Greater Toledo's 2-1-1 for consistent assessment within the Coordinated Entry.

In addition, specialized case management services through the PATH program will be utilized for individuals experiencing unsheltered and/or chronic homelessness. PATH's Community Outreach Specialists are trained to identify and engage unsheltered and chronically homeless individuals and connect them to needed services and Coordinated Entry for housing options. In addition, the PATH program provides intensive client-based specialized case management services that leads to improved outcomes for this population. TLCHB has begun coordinating community planning to address youth homelessness with our community partners with the objective to assess and disrupt the generational impact of experiencing homelessness and the increasing rise in youth experiencing homelessness. Over 2023-2024 TLCHB will develop a Youth Action Board and submit a Community Selection application on behalf of the jurisdiction through the 2023 Youth Homelessness Demonstration Program.

Addressing the emergency shelter and transitional housing needs of homeless persons

TLCHB and its CoC partners, utilizing the unified and comprehensive homelessness services delivery system-wide model of Housing First, will increase coordination and referrals to emergency shelter and transition housing services for homeless individuals. TLCHB regularly coordinates with its Coordinated Entry and local emergency shelters and transitional houses to maximize resources and ensure efficient and effective coordination. Where there is limited capacity in CoC shelters, TLCHB has developed a coordinated Hotel/Motel program through the Coordinated Entry. This program, born out of emergency pandemic needs, has continued to provide valuable emergency shelter services to vulnerable populations and will be continued through 2023-2024 in collaboration with the City of Toledo. TLCHB will also be assessing the needs of youth experiencing homelessness and the capacity of the CoC to address them in an adequate and appropriate way through the development of the Youth Action Board and application to the Youth Homelessness Demonstration Program. TLCHB will be reviewing and updating all policies related to CE access points in 2023 with the goal to streamline processes, eliminate gaps, and ensure effective participation among all service providers.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

TLCHB's organizational partnership with LMH, the utilization of the unified and comprehensive services delivery system-wide model of Housing First, and the continued use of the evidence-based tool Service Prioritization Decision Assistance Tool (SPDAT) will support implementation of this goal. Special assistance will be provided by TLCHB and CoC partners for chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. This process, including both the usage of the SPDAT tool and case conferencing will be utilized by TLCHB and CoC partners to shorten the time individuals and families experience homelessness and get sheltered or in housing options. The SPDAT allows for coordinated assessment for prioritization and placement of clients in appropriate housing programs. This tool provides our community with a comprehensive method to assist homeless individuals and families for shelter placement and permanent housing referrals and placements. A continuous review of this tool will provide TLCHB and the CoC partners with the latest and most accurate approach to assessing homeless individuals and families based on their individualized needs.

Housing Problem Solving through Coordinated Entry is able to complement traditional housing programs for those with most severe service needs to increase efficacy and efficiency by addressing barriers as well as working as a stand-alone resource available to all members of the community experiencing housing instability or homelessness who may not otherwise be able to access traditional housing resources, resulting in decreased time experiencing homelessness for both chronic and non-chronic populations.

With TLCHB partnership with LMH, we will provide stronger service coordination in referrals to affordable housing, housing supports, and long-term housing assistance such as tenant and project-based vouchers. This partnership with LMH will both increase referrals to affordable housing programs and address evictions as an entry point for homelessness for individuals and families.

TLCHB also has formal partnership with ABLE/LAWO, to support people sealing past evictions which may cause a barrier to permanent housing, and The Fair Housing Center, which is also partnering on addressing evictions by creating a Landlord-Tenant Mediation program to minimize and mitigate potential evictions within the system. TLCHB and LMH have established a joint Landlord Engagement Project (LEP) to work collaboratively within Lucas County's homelessness crisis response system to a) identify housing opportunities for households experiencing homelessness, both individuals and families; and b) coordinate with landlords and property managers to more immediate access to housing opportunities and promote housing stability for individuals and families with housing needs. The LEP seeks to create a collaborative partnership among landlords, property managers, participating human services agencies and household experiencing homelessness or housing insecurity.

Additionally, in 2022, TLCHB began new partnerships with CoC partners to expand rental subsidies and assistance programs to maximize the number of individuals being transitioned into permanent housing. TLCHB has also given CoC priority status to two pending permanent supportive housing developments being proposed this year.

Homeless individuals and families in re-housing programs are connected to financial opportunity and wrap around services providers. Through the Housing First process, case managers will be assigned to individuals to support them after moving into new housing. They will provide referrals to mental health support services, physical health support services, furniture, other necessities, and payee services to prevent reentry into homelessness.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

TLCHB and its CoC partners will also use the unified and comprehensive homelessness services delivery system-wide model of Housing First to achieve this goal and the organizational partnership with LMH. Further, the broadening of the CoC will include more cross-sector and inclusive services within Home for Everyone, connecting non-homeless service providers and housing sectors more deeply to the CoC, will assist us in achieving this goal.

Special attention for this goal will be paid to extremely low-income individuals and families, to those receiving assistance from CoC partners, and to individuals being discharged from publicly funded institutions and systems of care. These publicly funded institutions and systems of care include health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions. TLCHB began a formal partnership with Lucas County Children Services in 2022 to support transition aged youth in this effort. TLCHB will also continue to partner with LMH on the Park Apartments. With construction scheduled to begin in 2023, the Park Apartments will offer 45 units of safe, permanent supportive housing to transition aged youth (18-24 years old) with a certified disability. It will serve our community's highest-need youth experiencing homelessness. This population will benefit from a non-time limited supportive housing approach with youth-centered services, a model previously unavailable in our community and need demonstrated by local data. Lucas Housing Services Corporation/Lucas Metropolitan Housing, Harbor Behavioral Health, and the CoC will work together to provide true supportive housing, whereby property management works alongside a robust supportive services model to support all participants regardless of their needs or history. The CoC will certify eligibility and make appropriate referrals to the program through the Coordinated Entry.

TLCHB will continue to coordinate with TASC of Northwest Ohio, Inc on Warren Commons, a housing project which will provide forty-six one-bedroom units of permanent supportive housing prioritized for individuals who are homeless and disabled by mental illness, substance abuse, dual diagnosis and/or a physical disability.

Continuation and expansion of Housing Problem Solving activities at the front end of the Coordinated Entry through United Way/2-1-1 will address households at greatest risk of becoming homeless by diverting people from traditional CE resources through problem solving conversations, referrals to community resources, and the limited use of flexible financial assistance to overcome one-time barriers. Toledo-Lucas County's Eviction Prevention Partnership, a collaborative partnership comprised of eleven local agencies and organizations dedicated to providing a holistic approach to eviction prevention was developed through Emergency Rental Assistance II funds in April 2022 and has served over 100 households in its first six months of operation. Through these funds, TLCHB has created a full-time program coordinator position, increasing landlord recruitment through its ability to rapidly avoid eviction, provide financial assistance, and engage in one-on-one conversations with landlords and tenants. These conversations explain programmatic processes both within TLCHB and with other community resources, negotiate alternatives to legal evictions, refer to partners within the Eviction Prevention Partnership, and provide basic mediation and problem-solving between tenants and landlords.

Discussion

In the last two years, TLCHB and the CoC have undergone several instrumental and innovative organizational and system delivery changes, including the development and implementation of No Barriers Housing, which is a systemwide framework to ground our service delivery model in the philosophy and principles of Housing First. The goal of No Barriers Housing is to end chronic homelessness in Lucas County and to build a service delivery model to ensure all experiences of homelessness are rare, brief, and non-recurring.

TLCHB has developed and continuously coordinates a Race Equity Access committee to address the overrepresentation of the Black community in the numbers of those experiencing homelessness and the unsheltered population as compared to the numbers the Black community represent in the community census, the LGBTQ community population that experiencing homelessness due to gender or sexual orientation discrimination, and addressing other factors that contribute to increased risk of experiencing homelessness such as age, ethnicity or language barriers. It has implemented many changes, rebuilt programs and capacity and worked to remain the lead in support of eliminating homelessness in our community. TLCHB has been in direct partnership with LMH to establish the Park Apartments, which will house youth age 18-24 who need long term supportive housing. TLCHB has and will continue to act on behalf of all homeless service providers to provide up to date, responsive leadership to address the ongoing COVID pandemic.

TLCHB will continue to lead the community in ensuring that Housing First principals, equitable practices, and culturally appropriate and trauma-informed service delivery models are implemented in all programs; continue to expand and deepen partnerships; and update key performance indicators to further drive and predict trends to better service this population. These goals are achievable, and we look forward to improving outcomes for homeless individuals and families, or those at-risk of becoming homeless, in the coming year.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Jurisdictions that receive federal dollars, directly or indirectly, are required by the Department of Housing and Urban Development to complete an Analysis of Impediments (AI). The Analysis of Impediments process is prescribed and monitored by the federal Department of Housing and Urban Development and the State of Ohio's Department of Development. Specifically, to receive HUD Community Planning and Development formula grants, a jurisdiction must (i) certify its commitment to actively further fair housing choice; (ii) maintain fair housing records; and (iii) conduct an Analysis of Impediments to Fair Housing Choice.

An AI is a comprehensive review of barriers that inhibit residents from acquiring the housing of their choice based on federal, state, and local characteristics: race, color, national origin, religion, sex, familial status, disability, military status, sexual orientation, gender identity, immigration status, and source of income. The examination looks at issues in our community through a fair housing lens, including: community characteristics and demographics; income and poverty; transportation; employment; and public and private policies that impact protected groups and vulnerable populations, such as zoning, code enforcement, and real estate practices, among others.

The Fair Housing Center conducted an Analysis of Impediments to identify the fair housing barriers that will be addressed from 2020-2025. Emerging, persisting, and worsening impediments discussed in this document include the continuing effects of redlining and other forms of systemic discrimination; the indicators of low opportunity and health risks in neighborhoods of color; and the corresponding lack of housing mobility among occupants in neighborhoods of color. Other significant housing concerns are also illustrated, such as lead hazards; barriers faced by persons reentering the community after incarceration; and the emerging issue of discrimination based on source of income. The text also calls for affirmative programming and counseling to improve and inform housing choice and highlights the need for legislative changes to ensure the effectiveness of this programming.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

I. Housing Opportunity

Criminal History Screening

- Adopt local policies to reduce criminal history screening.
 - City of Toledo, The Fair Housing Center
- Set aside affordable housing for reentry population.
 - Lucas Metropolitan Housing, Other subsidized housing providers
- Encourage compliance with HUD's guidance on criminal history screening.
 - City of Toledo, The Fair Housing Center

Homeownership: Lending and Insurance

- Encourage lenders to provide credit opportunities in minority and low-income neighborhoods.
 - The Fair Housing Center with support from the City of Toledo
- Address insurance discrimination issues.
 - The Fair Housing Center with support from the City of Toledo
- Coordinate with local banks to create a loan product for low-income and minority neighborhoods.
 - The Fair Housing Center with Support from the City of Toledo

Accessibility for Persons with Disabilities

- Enforce current visit-ability and accessibility rules
 - City of Toledo, The Fair Housing Center
- Encourage developers to increase accessibility where they receive public funds or tax incentives
 - City of Toledo

Source of Income Discrimination

- Aggressively enforce local source of income discrimination laws.
 - City of Toledo
- Coordinate with Lucas Metropolitan Housing and landlords to address issues with vouchers.

Enforce fair housing protections

- Conduct investigations in response to allegations of housing discrimination, file complaints and/or lawsuits where appropriate.
 - The Fair Housing Center with support from the City of Toledo

Increase awareness of fair housing rights and responsibilities

- Engage in education and outreach activities including trainings and presentations, advertisements, distributing educational materials, participating in outreach events, and posting content on social media.
 - The Fair Housing Center with support from the City of Toledo

Voucher Mobility

- Lucas Metropolitan Housing should adopt policies consistent with the Poverty Race Research Action Council's recommendations.
 - Lucas Metropolitan Housing

Land Use and Zoning

- Adopt changes to policies and practices to address the identified impediments, such as restrictions on the development of group homes for persons with disabilities.
 - The City of Toledo with support from the Fair Housing Center
 - The City of Toledo should pass local law that removes zoning restrictions for group homes consistent with the recommendations of The Fair Housing Center.

LGBTQIA+

- Adopt changes to policies to address the identified impediments.
 - The City of Toledo with support from the Fair Housing Center
- As with the Source of Income discrimination law discussed above, the City of Toledo should ensure aggressive enforcement of the local anti-discrimination law that prohibits discrimination based on gender identity and sexual orientation.

Homelessness and affordable housing

- Coordinate with partners to create affordable housing opportunities and move forward with the Housing First initiative.
 - City of Toledo

II. Housing Stability

Housing Conditions

- Adopt changes to policies to address the identified impediments.
 - The City of Toledo with support from the Fair Housing Center and other community partners
 - The City of Toledo must ensure aggressive enforcement of local lead poisoning prevention law

Public transportation

- Lead efforts to adopt and expand county-wide transportation services. Ensure that persons with disabilities have access to paratransit county wide.
 - The City of Toledo with support from other local governments and other agencies

Impediments in Rental Housing

- Address the eviction crisis in Toledo. Increase funding for both the legal defense of evictions and for programs that prevent evictions from being filed.
 - The City of Toledo with support from other local governments and other agencies

Access to water services

- Ensure that the City's water meter replacement program does not cause water services to be terminated in a manner that disparately impacts protected classes under the Fair Housing Amendments Act, and ensure that persons with disabilities can request accommodations to avoid the termination of water services as needed. Enforce prohibition on exploitive resale of water services by housing providers.
 - The City of Toledo with support from other local governments and other agencies

Discussion:

Homelessness disparately impacts minority residents. However, opportunities are available to build new affordable housing to reduce homelessness as an impediment to Fair Housing.

- Directing more discretionary resources toward affordable housing

Discretionary funding sources, such as HOME and CDBG, should be evaluated to determine if a larger portion of those funds can be directed toward the development of affordable housing in the Toledo area.

Development of new housing resources must be cognizant of whether the location of the development will truly provide for access to transportation and other resources necessary to help the residents succeed.

- Supporting the new Housing First "No Barriers Housing" Initiative

A Housing First initiative is moving forward in the Toledo area. Public policy and available public resources should be directed to support this effort.

As mentioned above, the City of Toledo has adopted local source of income discrimination laws and other measures in its local anti-discrimination law. However, currently, this law is not being enforced. It is important that the City develop systems and processes to pursue enforcement of this local law.

Currently, the City is considering changes to local zoning laws to remove barriers to the development of group homes for persons with disabilities. However, this law is currently pending in a city council committee after some residents expressed opposition. It is important that the City follow through with removing barriers to fair housing choice by adopting the changes to the zoning code that fair housing advocates have requested.

Also related to zoning, on pages 109 through 110 of the Analysis of Impediments to Fair Housing Choice (AI), the AI strongly suggests that the City pay close attention to the development of plans created by local residents to ensure that neighborhood development occurs in a manner with which they are comfortable. As the City works on the development of its neighborhoods, it should be mindful of this issue. The City's zoning officials, for example, should ensure that developments are consistent with adopted neighborhood plans.

Enforcement of the City of Toledo's local lead poisoning prevention law is extremely important to address housing conditions issues. Housing conditions issues are identified as an important impediment to fair housing choice in Toledo. Moving forward, the City should ensure that an appropriate level of resources and staffing is dedicated to implementation of the law, and this should be monitored closely.

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Toledo is committed to meeting the needs of the underserved through program administration and in collaboration with its community partners. Through the programs offered by community partners and other local agencies, the City seeks to meet the needs of the underserved by creating and maintaining affordable housing, reducing lead-based paint hazards and reducing the number of families in poverty.

The City will continue to pursue opportunities to develop partnerships in all sectors of the community. The DHCD, through mandatory quarterly trainings offered to CDBG and ESG-funded agencies, expands knowledge of community agencies and resources. Additionally, speakers from local organizations are invited to share their expertise and experiences with the City's partners. The objective being to foster networking and information sharing to ensure better coordination of community services and efforts.

Actions planned to address obstacles to meeting underserved needs

With the use of CDBG, HOME and ESG funding the COT together with non-profit agencies, quasi-government agencies and other local agencies impact programs and/or services that address the needs of the underserved populations in the City of Toledo.

The City of Toledo, like other cities across the U.S., continues to face challenges with a strong contractor pool to serve the needs of the its construction/rehabilitation pipeline funded with HOME. This is particularly true with the Owner-occupied Rehabilitation Activity.

There is an ongoing effort to expand the contractor pool and to partner with other local agencies to deliver expedited assistance to the LMI households. This includes an open bid process and publication of contractor opportunities with the COT via local publications and social media. Engagement with local contractors has been a priority of the Department of Housing and Community Development as well.

The award of tax credits from the Ohio Housing Finance Agency (OHFA) to developers building in Toledo, Lucas County has been a challenge due to the lack of awards provided to development in Toledo. Of the applicants that responded to the Affordable Rental and Supportive Housing NOFA issued December 2021 and issued a Conditional Commitment letter, only (1) was successful in securing tax credits. The remaining developers that received a Conditional Commitment letter requested and was approved for an extension to allow them to reapply for the 4% tax credit pool. COT will be engaging OHFA to discuss a scoring mechanism that is more equitable when considering mid-sized cities in Ohio.

Partnering with The Fair Housing Center (TFHC), a 2020 Analysis of Impediments (AI) was completed. The AI includes action steps for the removal of fair housing obstacles in its Fair Housing Plan. The COT and TFHC will collaborate in the implementation of the action steps outlined in the Fair Housing Plan, in collaboration with other community partners.

Actions planned to foster and maintain affordable housing

The COT will use various initiatives, as well as HOME, HOME-ARP, ARPA, ERA, and CDBG funds to maintain and foster affordable housing. The goals identified in the Strategic Plan and the Action Plan include the construction and acquisition of affordable homes, rehabilitation of existing housing stock, home-buyer assistance, home repair programs for elderly and disabled, emergency rental assistance, and housing services for non-homeless special needs populations. The goals of the Annual Action Plan also included funding to increase the capacity of local non-profit community development corporations to develop affordable housing and/or attract larger for-profit developers to develop low-income housing tax credit rental units.

The COT will also work with partners and policy makers to increase rental housing through HOME-ARP funding in providing GAP financing for 9% and 4% tax credit. The COT engaged Root Policy to develop the HOME-ARP Allocation Plan which included contributions from key stakeholders in the City and County. On February 15, 2023, COT was notified that its HOME-ARP Allocation Plan was reviewed and approved by HUD. The deployment of the HOME-ARP funds will continue to support one of the housing strategy goals, which is to increase access to affordable housing opportunities within the City via new construction and/or rehabilitation of single- and multi-family units.

Also, the COT remains an active member of the Year 16 Initiative which is seeking to preserve the affordability of over 700 single family low-income housing tax credit financed units working along with local PHA, lenders, and intermediaries. The COT plans to work with a local university to determine the level of foreclosures including foreclosed homes and those at risk of foreclosure. The data will be used to determine the need for a foreclosure counseling program during the Consolidated Plan period.

Actions planned to reduce lead-based paint hazards

The City of Toledo (COT) continues its commitment to providing lead-safe, decent, safe and sanitary housing for eligible families. This effort uses a highly coordinated network consisting of private health officials, community development corporations, local public housing authority, social service agencies, and other City departments. The effort targets central City neighborhoods where low-income families occupy approximately two of every three residential units and the concentration of pre- 1978 structures containing lead paint is estimated to exceed 80 percent.

The Department of Housing and Community Development (DHCD) administers a Lead-Based Paint Hazard Control Grant program (OHLHD0453-20) received from the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH). The \$5.7 million grant is utilized to provide financial assistance to property owners to help control lead paint hazards in both owner-occupied and rental residential units within the City of Toledo. The initial 42-month period of performance for the grant began 01/04/2021 and concludes 06/30/2024. In order to maximize all funding from OHLHD0453-20 and complete as many units as possible, it is anticipated that the DHCD will request a no-cost extension of the period of performance to twelve (12) months beyond the original expiration date to 06/30/2025.

Over the life of OHLHD0453-20, a 42-month grant period, the DHCD has proposed to complete 175 Lead Inspection Risk Assessments, and make 175 residential units in the City of Toledo lead-safe. The DHCD has benchmarked the completion of 60 Lead Inspection Risk Assessments and 69 residential units made lead safe under OHLHB0636-20 during the 2023-2024 the Action Plan (July 1, 2023 - June 30, 2024).

The DHCD also received funding through a 3-year contract with the local health department to utilize BP-Husky settlement funds to make 40 units lead safe. The contract began on 05/01/2021 and was to continue up to 3/25/2023, however, a two-year extension was granted with a period end of 3/25/2025. It is anticipated that approximately 25 additional units funded through this source will be made lead safe during this stated action plan period.

Additional multi-year funding was received from the OLHCHH to pilot a cooperation demonstration between the City's Lead Hazard Reduction grant programs and NeighborWorks Weatherization program. The award provided \$1,000,000.00 to make 40 units lead safe along with air quality restoration. The period of performance runs from 07/29/2021 - 07/28/2024. It is anticipated that 25 Lead Inspection Risk Assessments will be performed and 30 residential units made lead safe under this grant during the 2023-2024 the Action Plan year.

Lead-based paint hazard control methods for all of the DHCD's lead programs include the utilization of low-level interventions, interim controls and partial component abatement. Abatement is the DHCD's preferred method in addressing paint surfaces. The program does not perform full abatement but rather the replacement of specific components and systems. Units are made lead-safe but not lead free.

Actions planned to reduce the number of poverty-level families

The consolidated plan's and this action plan's goals are to reduce the number of low-income residents or families in Toledo. The Department of Housing and Community Development provides housing and community development programs to low-income residents and families. Housing programs are designed to benefit households in the following ways: economic development, family stability, health improvement, homeownership, and community growth.

Actions planned to develop institutional structure

The Department of Housing and Community Development manages all aspects of the HUD grant programs and recognizes the need to maintain a high level of coordination on projects involving other City departments and/or organizations. This collaboration assures an efficient use of resources and optimal accomplishments.

The COT will continue to coordinate efforts with partners, including:

- Toledo - Lucas County Homelessness Board (TLCHB)
- Toledo - Lucas County Plan Commission
- United Way of Greater Toledo
- Lucas Metropolitan Housing (LMH)
- Mental Health and Recovery Services Board of Lucas County
- Lucas County Board of Development Disabilities

- Ohio Means Jobs/Lucas County
- Lucas County Land Reutilization Corporation (Land Bank)
- Toledo - Lucas County Health Department
- Toledo - Lucas County Port Authority

Each of Toledo's partners brings unique service components and experience. Maintaining these partnerships and collaborations is critical to achieving the desired community outcomes. The business community, faith-based organizations, public service entities, housing providers, foundations, and other community organizations that advocate on behalf of those in need have many relationships. Increased communication with all stakeholders in the community will continue.

Actions planned to enhance coordination between public and private housing and social service agencies

The COT will continue to work with a broad cross-section of public, private, faith-based, and community organizations to identify the needs of its residents. By continuing to collaborate with the CoC and the community, the City will continue to streamline the actions of public service agencies to improve the lives of all persons in Toledo. These groups address a broad range of needs for families including homelessness, workforce development, and community health.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

The COT uses CDBG and HOME funds in support for a variety of housing and community development needs and services. ESG is used for shelter operations, homelessness prevention, and rapid rehousing. This section shows information on program specific requirements for the Community Development Block Grant, HOME and Emergency Solutions Grant (ESG) programs.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The COT does not utilize any other forms of investment other than those noted in CFR 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Recapture Provision

The COT uses the Recapture Provision to ensure affordability for all homebuyer programs when a Direct Subsidy is provided to the homebuyer to purchase the property. A Direct Subsidy includes down payment, closing costs and other assistance to the homebuyer that reduced the purchase price from the fair market value to an affordable price.

If the homebuyer desires to sell the house and notifies the City within the affordability period, based upon the Direct Subsidy provided to the homebuyer, the City will use recapture provisions to mitigate noncompliance based on the prorated recapture formula below. The amount recaptured by the City cannot exceed what is available from net proceeds. Net proceeds are defined as the sales price minus superior loan repayments (other than HOME funds) and any closing costs.

Recapture Formula

To determine the pro-rata amount recaptured by the City:

- Divide the number of months the homebuyer occupied the home by the affordability period (in months), and;
- Multiply the resulting figure by the total amount of direct HOME subsidy originally provided to the homebuyer.

NOTE: *Development Gap Subsidies (i.e., the difference between the cost of producing the unit and the fair market value of the unit) are not subject to recapture as the homebuyer does not realize a direct benefit from these funds.*

Resale Provision

For properties that receive HOME development subsidies only, and there is no Direct Assistance to the homebuyer, the resale requirements below will apply if the home is sold during the affordability period:

- The new purchaser must be a low-income household with income at or below 80% AMI.
- The household income must be verified by the City. Income verification process and contact information is included in the Homebuyer Written Agreement.
- The property must be the family's principal residence and the new purchaser agrees to assume the remainder of the original affordability period.

Fair return will be measured by the percentage change in the Consumer Price Index over the

ownership period.

- The original homebuyer, now the home seller, must receive a "Fair Return" on investment, as defined by the City.
- The basis for calculating fair return will include a return on 1) the HOME-assisted buyer's original investment, plus 2) capital improvements made by the original buyer based on actual costs of improvements as documented by homeowner's receipts.
- The improvements include window and roof replacements; electrical and plumbing system upgrades; infrastructure improvements; kitchen and bathroom remodels; basement finishing and energy efficient upgrades.
- In some instances, it may be necessary for the City to provide HOME assistance to the subsequent purchaser to ensure that the original buyer receives a fair return and the unit is affordable to the low-income population, as defined.
- The Homebuyer Agreement must also include a provision of first right of refusal for the City to purchase the affordable unit if an eligible buyer cannot be found in a reasonable time frame.

To maintain continued affordability of the property throughout its affordability period, the City will ensure the home is affordable to LMI homebuyers at time of resale. The targeted population of such buyers will include households with incomes of 60%-80% AMI paying no more than 30% of gross income for principal, interest, property taxes, homeownership association dues and insurance. If the price that provides a fair return to the initial homebuyer is too high to be affordable for the subsequent LMI buyer to purchase the property, the City at its sole discretion, may provide HOME assistance as a direct subsidy to the subsequent buyer, thereby imposing a new affordability period and subjecting the assistance to the recapture provision.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:
 - The City enforces the recapture provision with a Homebuyer Agreement and Restrictive Covenant recorded in the land records of the City of Toledo.
 - The City enforces the resale provision with a Homebuyer Agreement and Restrictive Covenant recorded in the land records of the City of Toledo.

Foreclosure

As provided in 24 CFR Part 92.254(a)(5)(i)(A), "affordability restrictions may terminate upon occurrence of any of the following termination events: foreclosure, transfer in lieu of foreclosure or assignment of an FHA insured mortgage to HUD. The City may use purchase options, rights of first refusal or other preemptive rights to purchase the housing before foreclosure to preserve affordability. The affordability restrictions shall be revived according to the original terms if, during the original affordability period, the owner of record before the termination event, obtains an ownership interest in the housing."

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

HOME funds will not be used to refinance existing debt secured by multifamily housing.

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

Written standards are contained within the four documents listed below:

- OH-501 Toledo/Lucas County CoC Written Standards
- Coordinated Entry Referral Process
- Collaborative Governance of Coordinated Assessment
- Centralized Approach to Coordinated Access/Entry

See ESG Attachments for these documents.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The TLCHB, the local CoC governance body, in collaboration with the COT DHCD and based on community support, adopted a centralized approach for coordinated entry in August 2012 as its comprehensive collaborative delivery system of all publicly funded homeless services.

Coordinated Entry (CE) implemented across the community with various functions staged at logical and physical points. United Way of Great Toledo's 2-1-1 hosts the CE project, which is the coordinated entry point for all persons entering the homeless system. The CE performs both prevention and diversion, and when necessary refers, to emergency shelters and/or outreach workers. It should be noted that emergency shelters do not turn away walk-ins or simply refer them to the CE, but engage them in an initial screening to find a brief resolution (diversion) that does not result in emergency stay, if possible. If diversion does not exist, the shelter will provide accommodations to the household to connect to CE by phone and until subsequent next steps (which may or may not include assignment to the particular agency) are identified.

Emergency shelters, outreach workers, and other trained individuals are performing the Housing Assessment, which as of 2014 is the Service Prioritization Decision Assistance Tool (SPDAT). It helps identify which clients should receive what type of housing assistance intervention, and assist in determining the intensity of case management services. The TLCHB upgraded to the newest updated version of SPDAT in 2017.

The SPDAT Score, along with case manager recommendations and other factors, will be taken into consideration when forwarded to the referral specialist, who is currently the Executive Director at TLCHB. The information is used to create a prioritization list, also called the community list, which is used to make referrals to Permanent Housing projects (Rapid Re-Housing and Permanent Supportive Housing).

Governance of our CE system has multiple facets. The "Coordinated Assessment Collaborative Governance Policy" outlines the procedural aspects of monitoring the CE system. The members of the Continuum of Care (CoC) play an integral role in this process. Participation in the CoC via the Community Advisory Council

is agreed to formal membership with all publicly-funded organizations required to participate; we encourage and have cultivated a wide array of non-funded community members that participate as an elective. Assessment and assignment of Rapid Re-Housing stabilization services and short-term direct financial assistance were initiated through this approach as a direct result of the success of the Homeless Prevention and Rapid Re-Housing Program. Shelters, Rapid Re-Housing stabilization services and medium-term direct financial assistance joined in February 2013. Transitional and Permanent Supportive Housing were added in Spring 2013. Connecting households who are experiencing homelessness to a single, centralized point for Screening and Assessment/Assignment for Diversion, Homeless Prevention, and Re-Housing services were deemed the “*best fit*” for the Toledo community because of the results evidenced through the HPRP.

Through the Community Advisory Council, comprised of all funded homeless service providers and members of the TLCHB, United Way of Greater Toledo and the DHCD, as well as other community organizations with tangential goals and services, participants have the opportunity and responsibility to include the design and evaluation of CE and provide feedback on the cases being referred to them.

If for any reason a provider determines that a referred case is ineligible or inappropriate for their programs, CE and said provider work jointly to make a more appropriate referral. Due to local community needs and limited funding, the COT and the TLCHB do not fund Homeless Prevention activities at this time.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private non-profit organizations (including community and faith-based organizations).

The TLCHB, in partnership with the DHCD, established a timeline that included the following:

- A Citizens Review Committee (CRC) comprised of community representatives is identified, recruited, trained, and engaged in determining application priorities, process, scoring, and selection.
 - A mandatory application training and distribution meeting that is widely publicized, including direct invitation to current grantees and providers within the Toledo Area Alliance to End Homelessness (TAAEH).
 - Completed applications are submitted in a timely fashion that are reviewed, ranked, and recommend (or not) for funding.
 - The TLCHB Board of Directors votes on funding recommendations to be submitted to the DHCD. Recommendations are vetted and reviewed by the TLCHB and the DHCD for final selection and recommendations to the Mayor of Toledo and City Council.
4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

A written obligation within third-party contracts with TLCHB and the DHCD provides guidance to achieve this expectation and is monitored by both TLCHB and DHCD. TLCHB will meet this obligation either through board appointment from the COT or as an elected director. Recommendations and/or nominations from

the constituency are preferred. The nature of TLCHB CoC/ESG planning oversight work gives ample opportunity to engage those experiencing homelessness and/or those who have recently experienced homelessness toward the end of involving them in decision-making processes, including serving on standing committees and focus groups. ESG-funded agencies are required to have a formerly homeless representative on their boards.

5. Describe performance standards for evaluating ESG.

The local CoC established revised performance standards for funded agencies in November 2016. Not all program types have recommended targets for each performance indicator. Some program types have recommended targets for special populations instead of, or in addition to, overall targets. This is in concert with HUD's Interim Rule, which calls for *"performance targets appropriate for population and program type."* Targets are segmented according to the National Alliance to End Homelessness Rapid Re-Housing Triage Tool, which rates three areas of barriers to gaining and obtaining housing. Recommended targets are listed by program type for each indicator in the Key Performance indicator list.

The performance indicators are consistent regardless of funding sources. Standards established by the TLCHB for emergency shelter, transitional housing, homeless prevention and rapid re-housing activities are applicable to evaluating ESG activities.

In the Integrated Disbursement and Information System (IDIS), HUD's reporting computerized system; the performance objectives and outcomes are already predetermined based on the activity type/category. Each category has subcategories in IDIS. The grantee may not choose their performance objectives and outcomes; applicable objectives and outcomes as established in IDIS are as follows:

HESG Activity Category	Performance Objective	Performance Outcomes
Prevention	Provide Decent Affordable Housing	Affordability
HMIS	N/A	N/A
Rapid Re-Housing	Provide Decent Affordable Housing	Affordability
Administration	N/A	N/A
Shelter	Create Suitable Living Environment	Availability/Accessibility

The COT is not funding street outreach activities through its ESG funds. Please refer to AP-65 of this Action Plan for existing outreach and assessment activities in the COT.